

Regional Analysis of Impediments to Fair Housing Choice Salt Lake County

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REGIONAL ANALYSIS OF IMPEDIMENTS SUMMARY

Entitlement Jurisdictions: Salt Lake County, Salt Lake City, West Valley City, West Jordan City, Sandy City, Taylorsville City, and South Jordan City

Grantees of the Sustainable Communities Regional Planning Grants are required to complete a Fair Housing Equity Assessment (FHEA). HUD strongly encouraged grantees to use the FHEA to increase the effectiveness of the more comprehensive tool, the Regional Analysis of Impediments. Grantees of the Salt Lake County Sustainable Communities Regional Planning grant have chosen to develop a Regional Analysis of Impediments (RAI). To lessen the burden of transforming the FHEA into a RAI, HUD has provided technical assistance and guidelines to make it easier for grantees to conduct their analysis and address regional issues. The goal of the enhanced RAI is to provide jurisdictions with a comprehensive picture of the status of fair housing at the local and regional levels.

FHEA and Regional Analysis of Impediments

The RAI has a broader analytical scope than the FHEA. The RAI includes issues associated with race, color, national origin, sex, religion, familial status, and disability, the protected classes covered by the Fair Housing Act. The Salt Lake County RAI relies on the FHEA data and analysis to determine the impediments to fair housing choice and the impact of demographic change, segregation, racially and ethnically concentrated areas of poverty, and disparities of income on protected classes.

The FHEA documents in considerable detail the causes of impediments to fair housing choice; important demographic changes in protected classes, concentrations of poor minority and ethnic populations and disparities of opportunity that extend from the quality of local schools to the proximity to public transportation systems to availability of healthcare services. Using the data and analysis of the FHEA the RAI identifies the impediments to fair housing choice for protected classes as well as identifies policies and practices that worsen or lessen the impediments to fair housing choice. While the RAI has a regional focus, a local emphasis flows from the information in the FHEA. The FHEA appears as Part II of this RAI.

Once the findings of RAI are completed jurisdictions will use these findings to produce strategies and action plans to mitigate impediments to fair housing and “affirmatively further fair housing.” In addition the RAI findings will inform the priorities and strategizing of the Sustainable Communities consortium as it develops or implements a regional plan, particularly as it relates to decision-making on priorities and investments.

The RAI identifies those factors that have (1) perpetuated the concentration of protected classes within a few communities in Salt Lake County and (2) are currently barriers to limiting fair housing choice and opportunity. Essential background to the RAI is the affordable housing needs of protected classes, particularly the need for affordable rental housing. Estimates of the needs establish the housing hardship many protected classes experience. Affordable housing needs are, in part, a consequence of impediments to housing choice, which are identified and discussed in this summary followed by the listing of major impediments for entitlement jurisdictions. In almost all cases the impediments listed affect all members of protected classes but particularly minority, disabled, and large family households.

Regional Impediments to Fair Housing Choice

Housing opportunities for a disproportionate share of protected class households are limited to a geographic swath in Salt Lake County extending from west side Salt Lake City, south to South Salt Lake, then west to West Valle City, Taylorsville, Magna, and Kearns. Midvale is an island to the south of housing opportunities for protected class households. Zoning ordinances, Nimbyism, housing policy, and market conditions confine very low and extremely low-income households to this area. As shown in the FHEA these cities are opportunity poor communities with significant levels of inequality. This inequality leads to less equality of opportunity—particularly education and subsequent employment opportunities—which in turn leads to more inequality. This is the “adverse dynamics” or vicious circle created by impediments to equal housing opportunity that is the plight of one-in-five Salt Lake County households; approximately 60,000 households.

Segregation Due to Concentrations of Affordable Housing: Nimbyism, Zoning and Land Prices

Zoning practices and development approvals have a greater impact than any other factor on fair housing choice. If the high growth cities in the southeast and southwest quadrants of Salt Lake County do not allow increased levels of affordable housing, particularly rental housing, protected classes will become more highly concentrated and segregated by 2020 thereby further limiting housing choice. A majority of households in the protected class categories rent however, affordable rental opportunities are limited in a number of cities due to Nimbyism, zoning ordinances, which limit developable land, and the price of that scarce land. Consequently, low-income and poverty households in protected classes have become more concentrated due to limited housing choice. The consequences are particularly harmful to children, affecting their schools, social environment, and health.

Limited Incentives and Small Lots for Affordable Housing Reduces Ownership Opportunities

Minorities and Hispanics are at least twice as likely as white households to be low or moderate income households. Housing affordability is critical for homeownership opportunities for these protected classes. In some entitlement jurisdictions as well as non-entitlement jurisdictions in Salt Lake County housing is less affordable due to the absence of affordable housing incentives (density bonuses) and fee waivers, as well as restrictions on lot size and building materials. Due, in part to the high cost of a home, only 6 percent or 1,880 minority homeowners in the county live in Sandy and 3.1 percent, or 1,006, live in South Jordan. There are 32,450 minority homeowners in Salt Lake County. And of the 20,638 Hispanic homeowners in the county only 4 percent, or 896 households, live in Sandy and 2.4 percent, or 492 households, live in South Jordan. Non-entitlement cities with limited incentives are Riverton, Draper, Holiday, and Cottonwood Heights.

Housing Price Diversity

Lack of price diversity can impede fair housing choice. The lack of price diversity not only affects housing choice for low-income households but also housing choice for higher income households. For example, West Valley City and Taylorsville both have a disproportionately small share of homes priced above \$250,000. A home priced at \$250,000 or more is affordable to those households with at least a median income level. West Valley City with 11 percent of households in the county has only 1.1 percent of the homes priced above \$250,000. Taylorsville with 6 percent of the households in the county has only 1.8 percent of the homes priced above \$250,000. West Valley City and Taylorsville need to continue to concentrate on improving housing opportunities for higher income households.

Availability of Affordable Renter Housing Limits Housing Choice

The limited availability of affordable housing, particularly rental housing in some communities in Salt Lake County has disproportionately impacted minorities, ethnic groups, the disabled, and large families. These protected classes have limited opportunity to rent affordable housing in South Jordan and Sandy. Of the 33,350 minority renters and 21,000 Hispanic renter households in Salt Lake County only three percent live in Sandy and less than one percent lives in South Jordan. Non-entitlement cities with limited supply of affordable rental housing include Holiday, Riverton, Bluffdale, Herriman, Draper, and Cottonwood Heights.

Concentration of Tax Credit Projects

Siting practices have led to high concentrations of tax credit, public housing, and project based housing in Salt Lake City and West Valley City. This high concentration is an impediment to housing choice for many protected classes. Utah Housing Corporation should consider bonus points for tax credit projects in opportunity rich communities, which have very limited availability of affordable rental housing for *families*. Some *senior* tax credit projects have recently been developed in opportunity rich communities however, there is a much greater need for family projects. The preference of tax credit *senior* projects to tax credit *family* projects increases the likelihood of creating housing impediments for protected classes since very low-income family renters—the residents of tax credit projects—are disproportionately minority, disabled, or single-parent large families households.

Concentration of HUD Voucher Holders

The high concentration of rental units in a few cities inevitably leads to the concentration of the 5,700 HUD voucher holders, who are predominately very low-income, protected class households. All voucher holders have incomes below 50 percent area median income (AMI). Eighty-four percent of voucher holders are members of a protected class. Thirty percent of all voucher holders are minority households, forty-two percent are households with a disabled individual and twelve percent are large family households.

Vouchers are used to subsidize a voucher holders rent; consequently voucher holders must be located where rental housing is available. Furthermore, since the voucher holder's rental options are limited, in most cases, to rental units priced at or below Fair Market Rent, those rental options are primarily located in areas with older, lower priced rental units, not high rent properties in southeast and southwest Salt Lake County. Voucher holders are very low-income households; Fair Market Rent is the 40th percentile of gross rents (includes utilities) for typical, non-substandard rental units occupied by recent movers in a local housing market. For a three bedroom unit minus utility the upper market rent threshold would be about \$1,050.

Limited Supply of Vouchers

Vouchers are a housing lifeline for the 5,700 participating households. Without the voucher program the standard of living and housing opportunities for these households would be severely reduced. The current supply of vouchers helps only a small fraction of qualifying very low-income households. At least 30,000 very low-income renter households in Salt Lake County have no rent assistance. The limited number of vouchers, which has not keep pace with population growth nor the disproportionate increase in poverty households, is an impediment to fair housing choice and opportunity. The voucher waiting lists for the three public housing authorities in Salt Lake County are four to five years long. Two housing authorities are closed to any new applications. The severe shortage of vouchers is an impediment to fair housing choice.

Restricted Supply of Section 8 Vouchers Requires Mitigating Strategies

The limited supply of Section 8 Vouchers has a disparate impact on minorities, Hispanics, disabled individuals, and large families. These protected classes currently represent 84 percent of voucher holders in Salt Lake County illustrating the high demand among protected classes for rental assistance. While the limited supply of vouchers is a federal funding and policy issue, all entitlement jurisdictions and non-entitlement jurisdictions should understand the need and the shortfall for vouchers and develop mitigating strategies that will assist very low and extremely low-income renter households of protected classes. Forty percent of very low-income renters in Salt Lake County with severe housing problems are minority households, demonstrating the disproportionate need for rental assistance of minority households.

Concentration of Three and Four Bedroom Rental Units Limits Rental Housing Choice for Large Families

The limited number of three and four bedroom rental units has led to a concentration of large family renter households in Salt Lake City and West Valley City. Forty percent of large renter families live in Salt Lake City and West Valley City. South Jordan has only 2.6 percent of large family renters in the county and Sandy City only 5.7 percent. Non-entitlement cities on east side of the county and extreme southwest (Riverton and Bluffdale) have limited availability of three and four bedroom rental units.

Concentrations of Low-Income Minority Households May Harm Educational and Employment Opportunities

Lack of housing price diversity, due in part to zoning, has led to concentrations of low-income, poor minorities, and ethnic groups in many neighborhoods in northwest Salt Lake City, as well as the mid-valley cities of West Valley City and Taylorsville. The concentration of poor minorities and ethnic groups can have detrimental impacts on the performance of schools and students.

The low proficiency scores for low-income minority schools strongly suggest this is the case in Salt Lake County. HUD produced a school proficiency index ranging from one (very low) to ten (very high). The county average is 4.3. The school proficiency index for West Valley City is 1.6, for Taylorsville 2.4, and for west Salt Lake City 2.3. In 2011 fifty-eight percent of students in West Valley public schools were children in minority, ethnic, or immigrant households; forty percent of the students in Taylorsville were minority, and over 75 percent of the students in west Salt Lake City schools were minorities. Non-entitlement cities impacted by concentrations of low-income, minority student populations are South Salt Lake, Magna, and Kearns.

Without mitigating strategies by impacted cities and school districts the educational and employment opportunities of minority, ethnic, and immigrant children will suffer disproportionately. The mitigating strategies the Salt Lake City School District and the city have developed are a model for innovative approaches to reducing the educational risks for children in low-income, minority neighborhoods.

Concentration of Rental Units for Large Families and Disabled

The demand for rental units of four or more bedrooms exceeds the supply. Half of all large rental units are located in Salt Lake City and West Valley City. The supply of units and location of units can be an impediment to large families desiring to rent in southeast or southwest Salt Lake County. Likewise the rental housing opportunities for disabled renters are limited to west side Salt Lake City, South Salt Lake, West Valley City, and Midvale. Zoning ordinances and local opposition to high density multifamily rental units limits the location of rental opportunities for the 13,000 disabled renters.

Good Landlord Program

Good Landlord Programs should be adopted with caution. Some programs could be interpreted as discriminatory and impediments to housing choice for some protected classes. Salt Lake City's Landlord Tenant Initiative should be used as a model for interested entitlement and non-entitlement communities.

Understanding Code and Federal Requirements for Multifamily Housing Essential

Lack of familiarity of local building inspection offices with the International Building Code and the federally assisted multifamily housing requirements can impact fair housing choice for disabled individuals. Both the IBC and federal requirements mandate a percentage of multifamily units as accessible. There have been occasions when developers have completed apartment projects only to discover their project is not in compliance due to an oversight in the building inspectors office. All entitlement jurisdictions should ensure that inspectors understand the code and federal requirements and know where and how many accessible units have been built

CDBG and HOME Programs May, in Some Cases, Reinforced Disparities in Opportunities

Disparities in opportunity and the concentrations of protected classes may be reinforced and perpetuated by CDBG and HOME programs. CDBG administrators in all entitlement jurisdictions should use the findings of the Fair Housing and Equity Assessment as a guide to expand housing opportunities for minorities and the disabled in medium and high opportunities areas to avoid reinforcing existing patterns of minority concentrations.

Uneven Outreach and Fragmented Fair Housing Complaint Process

All jurisdictions need to improve their housing complaint process; formalize the process and develop outreach and education to raise awareness. All entitlement jurisdictions should have coordinated fair housing outreach efforts (website, brochures, English and Spanish) that can be adopted as part of a *regional* fair housing outreach effort. Education, outreach, and enforcement are currently undertaken on a city by city basis with differing approaches. Some have a process for adjudicating complaints, while most refer complaints to the state or HUD offices. There is no readily available database of Fair Housing complaints or legal action. The fragmented and disparate character plus the lack of centralized administration of the Fair Housing infrastructure is an impediment to those protected classes likely to face housing discrimination. In some counties across the country a single entity within a county administers Fair Housing issues. Centralizing the housing complaint process in a nonprofit such as Utah Housing Coalition or the Disability Law Center would mitigate this impediment.

Language Access Plans Fundamental to Housing Discrimination Complaint Process and Information

The absence of language access plans and the availability of language interpreters in the fair housing offices of entitlement jurisdictions disproportionately impacts minorities, ethnic populations, and immigrants. Information on the Fair Housing Act, housing complaint process, and fair housing websites in Sandy, South Jordan, Taylorsville, and West Jordan are only in English. A majority of housing discrimination complaints involve renters. Minorities and Hispanics are more than twice as likely to rent as non-Hispanic whites and therefore more likely to experience discrimination. One-in-four renter households in Sandy, South Jordan, Taylorsville, and West Jordan are of a minority.

Housing and Disabled Individuals

The number of disabled individuals in Salt Lake County is estimated by the American Community Survey, U.S. Census Bureau to be between 80,000 and 87,600 individuals, about 8 percent of the

population. Under the Fair Housing Act housing providers must make “reasonable accommodations in rules, policies practices or services when such accommodations may be necessary to afford a person with a disability the equal opportunity to use and enjoy a dwelling.” Currently nearly 40 percent of all rental housing in Salt Lake County is a detached single-family unit. This is a significant increase over the past ten years. Many of these reluctant landlords who are renting homes or small “mom and pop” housing providers are not aware of the full implications of the Fair Housing Act and the “reasonable accommodations” provision. The Fair Housing infrastructure in all cities has not systematically addressed the education of landlords regarding “reasonable accommodations.”

Gaps in Public Transportation Services Disproportionately Impacts Protected Classes

The infrequency (30 minutes or more) and proximity of bus routes in neighborhoods with high concentrations of minorities and disabled individuals in west Salt Lake City, West Valley City, and Taylorsville are impediments to fair housing choice and employment opportunities. The share of the minority population in these communities with limited public transportation service is: 69 percent minority in west Salt Lake City, 46 percent minority in West Valley City, and 29 percent minority in Taylorsville. Therefore minorities are much more likely to be impacted by gaps in public transportation in these cities. Non-entitlement areas with disproportionate number of minorities affected by gaps in public transportation are Magna and Kearns.

TODs Present Opportunity for Meeting Diverse Housing Needs

To avoid impeding fair housing choice for protected classes, housing projects at Transit Oriented Developments (TOD) should include housing types and prices that are consistent with the housing needs of protected classes as outlined in the Fair Housing and Equity Assessment. TODs offer a rare opportunity to bring together affordable housing, proximity to employment, and access to public transportation for *transit dependent households*, which are disproportionately minorities and the disabled. TODs are located in Salt Lake City, West Valley City, and Sandy.

Lending Practices

The Home Mortgage Disclosure Act (HMDA) provides information on lending practices of financial institutions by county and city. Recent HMDA data show that the mortgage application denial rate for Hispanics in Salt Lake County is about double the rate for white non-Hispanics. This difference can't be explained by income. After adjusting for income the difference in denial rates remains unchanged. And the data also show that Hispanics were victims of predatory lending. The incidence of high interest loans for Hispanics was three times as high as white non-Hispanics mortgagees. The inequality in lending practices is an impediment, which must be mitigated at the regional level by stepping up outreach efforts and credit counseling to minority communities and the financial community in order to improve loan approval rates.

Public Policy Recommendations to Reduce Impediments to Fair Housing Choice

Lack of Regional Collaboration is an Impediment

HUD's expressed goal for the Sustainable Communities Planning Grant is to encourage jurisdictions to consider housing, transportation, economic development, and investment decisions in an integrated regional approach. Many impediments to fair housing choice are common impediments shared by most cities within a region. The most effective mitigation to these common impediments is a coordinated, shared approach by the cities in the region. Collaboration between service providers and jurisdictions to develop a regional approach should be pursued.

Utah's Affordable Housing Statute

In 1996 the Utah State Legislature passed HB295 *Providing Affordable Housing*. HB 295 states, “the availability of moderate income housing is an issue of statewide concern.” To this end “municipalities should afford a reasonable opportunity for a variety of housing, including moderate-income housing to meet the needs of people desiring to live there.” This legislation provided very few incentives for compliance however, most cities have completed an assessment of affordable housing need, albeit in many cases cities have failed to update the housing assessment as suggested by the legislation. The requirements of HB295 have led cities to consider affordable housing issues on a narrow jurisdictional basis, which in some cases has resulted in impediments to fair housing. Many housing issues are best addressed when set in a regional context.

Since passage of the original affordable housing statute the state's population has increased from two million to three million. It is time to revisit Utah's affordable housing legislation and amend the legislation to encourage a regional (county) context of affordable housing needs. Utah State Department of Community and Housing, Utah Housing Corporation, local government officials, non-profit advocacy groups, and other stakeholders should be included in a working group to update HB295.

Testing for Housing Discrimination

The extent of housing discrimination in Salt Lake County is unknown. The fair housing complaint process does not appear to be an effective measure of housing discrimination. No testing of landlord discrimination or real estate agent “steering” has been conducted. Sending testers, who are minority and whites with the same financial qualifications, has proven to be an effective approach to assess the level of housing discrimination in a community. Fair Housing Initiative Program, CDBG or even CRA funds are possible sources of funding for a recommended bi-annual testing program. The absence of a testing program(s) is an impediment for all protected classes. Currently a small testing program is underway with the Disability Law Center.

Vague Housing Plans

While every city has developed a housing element to their General Plan, often based on the housing needs assessment required by Utah's affordable housing legislation HB 295, very few of the plans address the most fundamental approach to improve housing opportunities for protected classes; the addition of high density, affordable rental housing. Current and projected affordable rental housing needs for the very low and extremely low-income households are not specified by any of the entitlement cities housing plans; nor is a strategy to increase affordable rental housing discussed. With exception of Salt Lake City and Sandy City any discussion of incentives, density bonuses, and inclusionary zoning for affordable housing is absent from entitlement city housing plans. And it is rare when protected classes, the Fair Housing Act, and housing discrimination are mentioned. Issues of fair housing, again with the exception of Sandy and Salt Lake City, are not given any priority in housing plans.

Limited Cases of Innovative Public-Private Partnerships

Development and land costs are barriers to development of affordable housing in many communities. But some development costs can be offset by waivers for affordable housing and other incentives. Land costs can be reduced by public-private partnerships including innovative financing by developers with the assistance of the city, participation by nonprofit organizations, various housing trust funds, and RDA set asides for affordable housing. Lack of commitment by some jurisdictions to public-private partnerships to develop affordable housing is an impediment.

More Aggressive Use of RDAs Housing Set-Asides

Most cities have Redevelopment Authorities, which require set-asides for affordable housing. With the exception of Salt Lake City, few cities have been aggressive in the use of set-asides to develop housing. In the structure of the RDA development housing set-asides are too often back-loaded, i.e. development is delayed until near the expiration of the RDA.

Absence of Incentives for Affordable Housing

Incentives for the development of affordable housing are important features of a strong public private partnership. Incentives such as inclusionary zoning, density bonuses, fee waivers, and accessory units are measures used by some jurisdiction nationally to “affirmatively further fair housing.” These incentives are absent in the ordinances and policies of most cities in Salt Lake County. Of the entitlement cities only Salt Lake City has inclusionary zoning and incentives for affordable housing while only Sandy allows accessory dwelling units in a residential zone.

Demographics of Renters of Tax Credit Communities

There are 9,500 tax credit rental units in Salt Lake County. The role these units play in “affirmatively furthering fair housing” for protected classes is unknown. With the support of the Utah Housing Corporation an annual survey of tax credit residents should be conducted to determine the share of renters that are protected classes; minority, Hispanic, disabled, large-related family, etc. The results will provide insights on impact of tax credit rental housing on spatial distribution of protected classes.

Long Range Transportation Plan and Envision Utah’s Your Utah Your Future

The Sustainable Communities Planning Grant is a multi-agency program to encourage the integration of housing, transportation, and economic development decisions on a regional basis. HUD’s goal is to raise the priority of housing in the capital investment decision making process. Locally the relevant agencies for coordination are Wasatch Front Regional Council (MPO), Envision Utah, Utah Transit Authority, and Utah Department of Transportation. The housing and transportation needs of protected classes, who are disproportionately public transit dependent, should be a high priority in decisions regarding public transit investments, schedules, routes, and fees. A lack of attention to equitable housing and the transit needs of protected classes in the long range planning of these agencies is a potential impediment to fair housing choice.

Economic and Demographic Impediments

Economic and Demographic Forces

Undoubtedly there are powerful underlying economic and demographic forces at work leading to greater concentrations of minority and poor populations, significant disparities of opportunity and major impediments to fair housing choice. For the most part these forces are independent of policies and practices of local governments and the action plans set forth in consolidated plans. It’s generally accepted that economic and demographic forces—income, employment, housing prices and, to a lesser extent, population trends—reflect conditions of supply and demand. While these forces may be largely independent of local policies and practices there are cases where local public policy can have rather significant impacts on local economic conditions, particularly housing prices.

Income – Probably the factor with the most widespread impact on fair housing choice and access to opportunity is income. For thirty years the Utah economy and households have struggled with relatively low wages. Currently the average wage in Utah is only 80 percent of the average wage rate nationally. The median household income in Salt Lake County, in inflation adjusted dollars, has

declined by about 5 percent in the past ten years; dropping from \$62,000 to \$59,000. The poverty rate in Salt Lake County increased from 8 percent of the population in 1999 to 14.4 percent in 2011. The number of children in poverty jumped from 25,300 twelve years ago to 44,450 in 2011, an average annual increase of 5.8 percent, roughly four times the rate of population growth. Stagnant and declining wages are the biggest threat to the improvement in economic well-being, opportunities, and affordable housing choice for Salt Lake County households. Short of raising the state minimum wage, a change in the right-to-work statute or pushing through large increases in public sector wage rates—none of which are political possibilities—local action or policy is limited in the short-term in offsetting the deleterious effects of weak wage rates and declining household income. Long-term approaches include innovative changes in education, housing, transportation and economic development policy.

Employment – The Utah economy is enjoying a rapid recovery from the worst recession since the Great Depression. The Salt Lake County job market has added about 25,000 jobs over the past year an increase of 4.2 percent. This very promising recent performance however is tarnished by the large number of Utah workers who have dropped out of the labor force over the past five years. An estimated 100,000 individuals are unemployed discouraged workers who are no longer looking for work. This group is dominated by males between ages of 25 and 54 years. As the skills and confidence of the long-term unemployed atrophy the economy suffers a loss in output while households face steeper impediments to housing and opportunity.

Land and Housing Prices – Land and housing prices are intimately connected. Twenty-five to 30 percent of the price of a home is comprised of the value of the land. Land prices are prone to extreme volatility which feeds the volatility of housing prices. Over the past two housing cycles Utah has led the country on two occasions in high price increases, 1997 and 2007. During the three year run-up in prices in the mid-1990s housing prices increased over 70 percent and in the three year run-up in the mid-2000s prices increased by over 50 percent statewide. In addition to this volatility there is significant variability in housing prices throughout Salt Lake County. Some cities and neighborhoods are enclaves of high-priced homes, which in no small part reflect zoning ordinances regarding lot size and building materials, along with other practices and policies of the jurisdiction. Local policy is a chief component of local land and housing prices. Changes in existing policy in many communities could have a major impact on the availability and concentration of affordable housing.

Rental Housing Demand – The Great Recession held down the demand for rental housing in two ways: (1) reduced net in-migration and (2) reduced the rate at which young adults form independent households. As the economy recovers and the number of jobs increases both of these determinants of rental demand will improve.

There is considerable pent-up demand in the housing market due to the economic contraction which not only affected migration and formation of young households but also contributed to doubling-up of households due to job losses and foreclosures. This pent-up demand will be released as economic conditions improve. Many of the households in this pent-up demand group have had credit problems, consequently they will not be able to qualify for homeownership. Additionally many of these household are low-income households. Weak wage levels and income growth increases the demand for rental housing. For most low-income households rental housing will be the home of necessity rather than choice. And the availability of rental housing is constrained in large

measure by zoning ordinances and Nimbyism which reduce fair housing choice, push rental rates up, and limit housing opportunity particularly for protected classes.

Demographic Changes –The need for affordable housing will accelerate as the county’s minority population increases. From 2000 to 2010 the minority population in the county increased by 56 percent while the total population increased by 14.6 percent. At the same time the Hispanic population increased by 64 percent. Over the decade nearly three quarters of the population growth in the county was due to the increase in the minority population. Minority households have a greater likelihood of being moderate to low-income renter households. This demographic trend will put increased pressure on the supply of available affordable rental housing.

In addition to the growth of the minority population, the growth of a specific household type; single women with children under 18 years of age, will likely add disproportionately to the demand for affordable rental housing. In Salt Lake County, over the last ten years this household type increased by 6,700 households, or 22 percent. This household type is likely a moderate to low-income housing in need of affordable rental housing.

Another fast growing population group is the senior population. The number of seniors over 65 years is expected to increase by 30 percent in the next ten years, and those over 85 will increase by 27 percent, or an additional 3,200 individuals. While seniors are not a protected class, nearly half of all individuals over 75 years suffer from some disability. The increase in the Senior population will expand the need for residential care facilities as well as accessible rental units.

Affordable Housing Needs and Protected Classes

Affordable rental housing is the greatest housing need for protected classes. Over half of all minority households rent and these households are more likely to be very low or extremely low-income households. Therefore policy measures that encourage additional affordable rental housing are the most effective in meeting the unmet housing needs of protected classes and affirmatively furthering fair housing. Conversely, policy measures that limit or preclude the development of additional affordable rental housing are serious impediments to fair housing choice.

**Table 1
Households by Income in Salt Lake County, 2012**

Category	Households
Households	355,000
Median Income Households	177,500
< 80% AMI Households	142,000
< 50% AMI Households	88,750
< 30% AMI Households	53,250
Occupied Housing Units	355,000
Owner Occupied Units	237,850
Renter Occupied Units	117,150

Source: Derived from the U.S. Census 2010.

The most critical unmet housing needs are concentrated in the very low and extremely low-income households. These households comprise a significant share of the county’s population. One-in-four households in the county have incomes below 50 percent of the Area Median Income (AMI). Of the 355,000 households in Salt Lake County in 2012, 88,750 were households with very low-income; \$35,000 or less for a family of four. There were over 53,000 households with extremely low-income,

approximately \$21,000 or less for a family of four *Table 1*. Again these households are much more likely to be renter households of protected classes.

Local and federal programs provide housing assistance for a number of very low and extremely low-income households through Section 8 Housing Choice Vouchers, local housing authority’s public housing units, and the low-income housing tax credit program administered by the Utah Housing Corporation. Combined these programs provide over 17,000 rent assisted units to very low and extremely low-income renter households in Salt Lake County *Table 2*.

Table 2
Total Assisted Rental Units
in Salt Lake County, 2012

	Number
Total Vouchers All Types	5,824
Tax Credits Units	9,300
HUD Project Based Units	1,100
Public Housing Units	945
Total Assisted Units or Persons	17,169
Percent of All Renters Assisted	14.6%

Source: Public Housing Authorities, HUD CHAS 2005-2009 and Bureau of Economic and Business Research, University of Utah.

The supply of rent assisted units however, is far short of the need. The HUD CHAS data for Salt Lake County gives an estimate of nearly 20,000 renter households that are very low-income, with *no rental assistance* and severe housing cost burden—more than 50 percent of their income devoted to housing. These very low-income, severely cost burdened households include nearly 7,000 minority households, 2,800 households with a disabled individual, and 1,500 large family households *Table 3*. The need for affordable rental housing for these protected class households is acute. Identification and mitigation of housing impediments is paramount to improving their housing choice and opportunity.

Table 3
Very Low-Income Renter Households with
Severe Housing Cost Burdens, Salt Lake County

	Renter Households
Total	19,450
Whites Non-Hispanic	12,500
Minorities	6,950
Hispanics	4,400
Disabled	2,800
Large Family (5 or more)	1,500

Source: HUD CHAS 2005-2009.

Some Local Impediments in Entitlement Cities

Three impediments to fair housing are listed for each entitlement city however, some of the impediments listed in the Regional Impediments may also be applicable to the entitlement cities and should be considered in action plans to “affirmatively further fair housing”.

Salt Lake City

(1) *West Side Diversification* - Of the six entitlement cities in the county Salt Lake City has fewer impediments to fair housing choice and a greater variety of housing types accommodating all income

and age groups than any other city. An example of the city's role in providing affordable housing is large rental inventory in the city. Fifty percent of all housing units in the city are rentals, accounting for one-third of all rental units and one-half of all tax credit units in the county. Perversely, the city's willingness to accommodate affordable housing has led to a high concentration of low-income, protected classes in the city's residential area west of I-15, which includes among other neighborhoods Rose Park, Poplar Grove, and Glendale. This high concentration of low-income minority households has created a severe burden and inequality in west side city schools and has become an impediment to opportunity. The gradual and long-term goal of greater diversification in the west side housing inventory will reduce this impediment, along with a coordinated effort with Salt Lake City School District, which is underway, to target at risk schools with an array of pre-school and after school programs. Greater housing diversification (potential of North Temple Corridor) and constant attention to educational opportunities are key to reducing this impediment.

(2) *Testing for Discrimination* – As the largest city in the county and given the city's significant share of protected class households a bi-annual housing discrimination testing program would be very beneficial. Not only would the program provide information on recent experiences and the location of that housing experience, the results would reduce some of the uncertainty regarding housing discrimination. Many believe housing discrimination is not a problem; an attitude that is an impediment to improving fair housing choice.

(3) *Quantify Need* – The city's housing plan needs to be more specific about current rental inventory, and the issue of high concentrations of in west side neighborhoods. This information would help in development of a strategy for west side diversification.

Sandy

(1) *Increase Affordable Rental Housing* - Sandy City has 9 percent of the population of Salt Lake County but only 5 percent of the rental housing units. And of the nearly 5,800 rental units in Sandy less than 7 percent are rent-assisted units—the type of rental units in high demand by low-income, protected class households. Given Sandy's advantageous location with excellent proximity to the transportation network and large employment base, the scarcity of rent-assisted units is an impediment for protected classes.

(2) *Public Private Partnership* – The high cost of land is an impediment to the development of affordable rent-assisted units. Sandy City is in the very early stages of the development of the Sandy Civic Center, an 800 acre area that will be redeveloped over the next 30-years. The project is ideal for a public private partnership, tapping RDA set-aside funds, to increase the opportunity for affordable family rental housing in the city. To overlook this possibility in the long-range planning for the Sandy Civic Center would be an impediment to housing opportunity.

(3) *Nimbyism* – Nimbyism was cited by the Sandy City planner as the largest impediment to expanding housing opportunities. The effects of the Nimbyism impediment can be reduced by outreach, education and involvement of community and stakeholders in potential development scenarios that include expanded housing opportunities for protected classes.

South Jordan

(1) *Housing Plan Fails to Address Affordable Rental Housing* – South Jordan's housing plan, completed in 2010, makes little mention of rental housing. The emphasis of the plan is on detached single-family dwellings. Higher density housing is referred as multifamily housing. The low priority in the housing

plan given to affordable rental housing and the absence of any estimates and projections of affordable housing needs is an impediment to housing opportunity.

(2) *Large Single-Family Lots* – Of the six entitlement cities South Jordan has by far the largest median lot size for detached single-family homes. The median lot size is .28 acres and three quarters of all single-family parcels are larger than .17 acres. By comparison the median lot size in Taylorsville is .19 acres and in Sandy City .22 acres. The dominance of large lots reduces the diversity of housing prices and types, and is an impediment to housing opportunity.

(3) *Absence of Rent-Assisted Family Rental Units* - Currently about 15 percent of the city's housing inventory is rental units, but there are no rent-assisted *family* projects in the city. South Jordan's rental inventory is comprised of high-end market rate units and rented detached single-family homes, condominiums, and townhomes. The absence of rent-assisted rental units for families is an impediment to fair housing choice for low-income, protected class renters.

Taylorsville

(1) *Limited Price Diversity in Housing Inventory* – The owner-occupied housing inventory in Taylorsville has a relatively narrow price range limiting the potential for life-cycle housing opportunities. Families desiring to remain in Taylorsville but looking for move-up opportunities in the \$250,000 price range have limited choice. The city's most recent housing plan, completed in 2006, lays out the need and policies for increased housing diversity. An updated housing plan needs to be undertaken with an examination of housing diversity and the effectiveness of the 2006 strategy in mitigating the lack of price diversity impediment.

(2) *Lack of Incentives May Be An Impediment* – Currently the city has no incentives for housing development. Given the need for greater price diversity development incentives for higher price owner occupied housing could reduce the price diversity impediment.

(3) *Fair Housing Infrastructure* – Taylorsville has a relatively high concentration of protected classes; minority, ethnic, disabled, and large family households increasing the likelihood of housing discrimination. Taylorsville needs to establish a coordinated program of outreach, education, and the administration of fair housing issues targeted primarily at renters.

West Jordan

(1) *Expressed Housing Ratio Goal of 83/17 is Regional Impediment* – West Jordan's recent housing plan articulates a long-term goal of an owner to renter ratio of 83 percent to 17 percent. This renter ratio is about half the current countywide ratio. Most housing economists believe that in the future the owner to renter ratio will likely move in the direction of more renters due to affordability, changing demographics, sluggish incomes, and housing preferences. Given these conditions, a long-term goal that reduces the ratio from the current 20 percent to 17 percent is a regional impediment to housing opportunities for protected classes. The population of West Jordan is expected to increase by 50,000 by 2030. It will be one of the most rapidly growing cities in the county. To limit rental housing to 17 percent of the housing inventory in a large and rapidly growing city is contrary to a regional approach to fair housing.

(2) *Omission of Incentives for Rent-Assisted Rental Housing* – Due to increasing land costs incentives such as density bonuses and fee waivers for rent-assisted projects would support and stimulate apartment

development providing affordable rental housing opportunities. West Jordan has no incentives for affordable housing development.

(3) Housing Plan Vague on Future Needs by Type – The West Jordan housing element (2012) does not quantify current or projected housing needs for moderate income households but rather discusses only overall housing demand and demand for elderly population. Greater detail on housing needs by income group would help clarify long-term housing plan.

Note: It's important to acknowledge that over the past ten years West Jordan has been a leader in new apartment development with the addition of nearly 2,200 new apartment units. As a high growth community future support for additional affordable rental housing is crucial to reduce impediments to housing choice.

West Valley City

(1) West Valley Housing Authority: Demographics of Voucher Holders - Minority households have a disproportionately low share of vouchers in West Valley City. Forty-three percent of the population in the city is minority but only 18 percent of voucher holders are minority households. The low share of minority representation may be an impediment to the protected class particularly since it does not seem to be offset by a large share of vouchers for disabled individuals as is the case with the other two housing authorities in the county. The prevailing characteristics of voucher holders of the Housing Authority of West Valley City are: white single-parent and white senior households.

(2) Housing Discrimination Complaint Process – The housing discrimination complaint process offers no on-line or phone-in options. Complaint forms must be picked-up at the housing authority office. Given the relatively large share of renters and protected class households in West Valley City—which raises the need for a streamlined housing complaint process—the current complaint process is an impediment.

(3) Residential Care Facility – While West Valley City's zoning ordinances allow for large residential care facilities (six residents or more) there are no licensed facilities in the city. This is apparently due to corporate location policy of residential care providers rather than any political or neighborhood opposition in West Valley City. The city should consider a public private partnership and incentives to attract a residential care provider to reduce this impediment. The disabled are primary residents of such facilities.

PART I
SECTION I
A REGIONAL ANALYSIS OF IMPEDIMENTS
TO FAIR HOUSING CHOICE

An Analysis of Impediments (AI) to Fair Housing Choice has been a long-standing U.S. Department of Housing and Urban Development (HUD) mandated review of a jurisdiction's ordinances, policies, and programs, as well as private actions that affect fair housing choice. Since August of 2011 however, a transition of the traditional AI has been underway. That transition includes two key elements: (1) the addition of the FHEA which "in scope and content" is quite similar to the AI and (2) shifting the emphasis of the traditional AI from jurisdictional to regional. Quoting HUD "the Regional Analysis of Impediments (Regional AI) offers considerable value in assessing fair housing issues, as many of the fair housing issues that are most intractable are best addressed at a regional level." While focusing on regional issues the Regional AI does not abandon a jurisdictional analysis. As HUD documentation notes "the Regional AI includes an analysis that identifies both jurisdictional and regional impediments to fair housing choice."

This Regional AI includes many of the same features of the traditional AI including:

A review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices.

An assessment of how those laws, policies, and practices affect the location availability and accessibility of housing.

An assessment of public and private sector conditions affecting fair housing choice.

Identification of actions, omissions, or decisions that have the effect of restricting fair housing choice because of race, color, religion, sex, disability, familial status, or national origin.

In addition HUD continues to require entitlement jurisdictions to take appropriate actions to overcome the effects of impediments identified through the analysis and maintain records reflecting the process in mitigating impediments and affirmatively furthering fair housing choice.

Protected Classes

The Regional AI has a broader analytical scope than the FHEA in that it must encompass issues associated with race, color, national origin, sex, religion, familial status, and disability, important protected classes covered by the Fair Housing Act. Discrimination is most likely to occur against protected classes with the largest populations. Therefore it is important to provide a demographic context of the protected classes. *Tables 1-4* show the number of individuals in protected classes in Salt Lake County and the entitlement cities. For example, the minority population (including Hispanics) represents a little over a quarter of the population of the county. In Salt Lake City one-out-of-every-three individuals is a minority and in West Valley City nearly one half of the population is minority. West Valley City will soon be the first major city in the state to become minority-majority.

Table 1
Population Estimates by Protected Class Categories, 2010

	Total Population	White	Minority	Hispanic	African American	Pacific Islander	Asian	Native American	Other
Salt Lake County	1,029,655	761,885	267,770	176,015	14,622	15,443	33,454	6,565	21,671
Salt Lake City	186,440	122,325	64,115	41,637	4,613	3,706	8,151	1,624	4,384
Sandy	87,461	75,260	12,201	6,447	558	541	2,599	335	1,721
South Jordan	50,418	44,387	6,031	3,008	316	424	1,295	69	919
Taylorsville	58,652	41,540	17,112	10,931	988	1,258	2,252	378	1,305
West Jordan	103,712	77,360	26,352	18,364	855	1,588	2,732	517	2,296
West Valley City	129,480	69,498	59,982	42,892	2,254	4,647	6,303	1,137	2,749

Source: U.S. Census Bureau.

Table 2
Percent Share of Population by Protected Class, 2010

	Total Population	White	Minority	Hispanic	African American	Pacific Islander	Asian	Native American	Other
Salt Lake County	100.0%	74.0%	26.0%	17.1%	1.4%	1.5%	3.2%	0.6%	2.1%
Salt Lake City	100.0%	65.6%	34.4%	22.3%	2.5%	2.0%	4.4%	0.9%	2.4%
Sandy	100.0%	86.0%	14.0%	7.4%	0.6%	0.6%	3.0%	0.4%	2.0%
South Jordan	100.0%	88.0%	12.0%	6.0%	0.6%	0.8%	2.6%	0.1%	1.8%
Taylorsville	100.0%	70.8%	29.2%	18.6%	1.7%	2.1%	3.8%	0.6%	2.2%
West Jordan	100.0%	74.6%	25.4%	17.7%	0.8%	1.5%	2.6%	0.5%	2.2%
West Valley City	100.0%	53.7%	46.3%	33.1%	1.7%	3.6%	4.9%	0.9%	2.1%

Source: U.S. Census Bureau.

Table 3
Number of Disabled Individuals and Selected Households Types, 2010

	Total Population	Disabled Individuals	Large Family Households	Single Parent with Child Under 18 yrs Households.	Households with Persons over 65
Salt Lake County	1,029,655	86,989	62,057	34,922	64,707
Salt Lake City	186,440	19,804	7,730	6,480	13,382
Sandy	87,461	6,610	5,214	2,401	5,673
South Jordan	50,418	3,466	4,028	891	2,486
Taylorsville	58,652	5,475	3,430	2,224	3,961
West Jordan	103,172	6,344	7,746	3,686	3,582
West Valley	129,480	10,093	9,891	5,529	6,619

Source: U.S. Census Bureau.

Table 4
Percent Share of Disabled Individuals and Selected Households Types, 2010

	Total Population	Disabled Individuals	Large Family Households	Single Parent with Child Under 18 yrs Households.	Households with Persons over 65
Salt Lake County	100.0%	8.4%	6.0%	3.4%	6.3%
Salt Lake City	100.0%	10.6%	4.1%	3.5%	7.2%
Sandy	100.0%	7.6%	6.0%	2.7%	6.5%
South Jordan	100.0%	6.9%	8.0%	1.8%	4.9%
Taylorsville	100.0%	9.3%	5.8%	3.8%	6.8%
West Jordan	100.0%	6.1%	7.5%	3.6%	3.5%
West Valley City	100.0%	7.8%	7.6%	4.3%	5.1%

Source: U.S. Census Bureau.

General Housing Plans

The housing needs of protected classes are part of a larger affordable housing need identified every four to five years by each municipality and county in Utah. In 1996 the Utah Legislature passed HB

295 which requires cities and counties to adopt an affordable housing plan. The state legislation focuses on affordability rather than protected classes—leaving that to federal law. To the extent that the state legislation increases affordable housing, particularly rental housing, the housing choices of protected classes are expanded since protected classes are disproportionately low-income renters.

The Utah statute states that the housing plan should “afford a reasonable opportunity for a variety of housing, including moderate income housing to meet the needs of people desiring to live there.” The affordable housing legislation requires cities to review their affordable housing plan every two years and update current and future affordable housing needs. These plans generally are very descriptive and provide information on housing inventory, affordability, and need. The affordable housing plan, as stated in the legislation, should be incorporated in the city’s General Plan. The General Plan of a jurisdiction establishes a vision for the community and provides long-range goals and policies to guide the development in achieving that vision.

All cities in Salt Lake County have submitted updates to their original affordable housing plan however, only seven cities have recently (2010-2012) updated their plans. Five of the six entitlement cities have complied with the legislation, Taylorsville is the only exception. However, only two of the nine non-entitlement cities have current plans *Table 5*.

Table 5
Year Affordable Housing Plan Updated

	Year Updated
<i>Entitlement Cities</i>	
Salt Lake City	2012
Sandy City	2012
South Jordan	2010
Taylorsville	2006
West Jordan	2012
West Valley	2011
<i>Non-Entitlement Cities</i>	
Bluffdale	2000
Cottonwood Heights	2005
Draper	2006
Herriman	2001
Holladay	2011
Midvale	2003
Murray	2003
Riverton	2001
South Salt Lake	2009
Salt Lake County	2010

Source: Utah Dept. Community and Housing.

The absence of a current housing plan may be an impediment to fair housing choice and more specifically, regarding the substance of the plans, only a few affordable housing plans treat in any detail the future need for additional affordable rental housing. When need is discussed it is usually limited to owner-occupied units. But the greatest need for affordable housing is an expansion of rental housing; rental housing targeted at households with incomes below 50 percent AMI. Twenty-five percent of all household, in the county have incomes below 50 percent AMI, and a large share of these households rent. Those renters that are not in rent-assisted housing are very likely dealing with moderate to severe housing cost burdens and impediments to housing choice. To mitigate impediments affordable housing plans should address ways a city can increase its affordable rental inventory. It would be encouraging if more of the affordable housing plans identified the need for

rental housing and discussed approaches to development such as public private partnerships, inclusionary zoning, density bonuses, accessory units, TODs/affordable housing, etc.

Land Use Element

The Land Use Element of a General Plan designates the general distribution, location, and the extent of uses of land for all types of purposes including housing. As it applies to housing the Land Use Element establishes a range of residential use categories and specifies densities and suggests the types of housing appropriate in a community.

Residential Densities – A number of factors, both public and private, affect the supply, location, and cost of housing in a local market. The public or governmental factor that most directly influences the character and pattern of residential development is the allowable density range of residentially designated land. For developers of housing, density ranges are critical to economic feasibility of a project. Higher densities, generally allow developers to take advantage of economies of scale and reduce the per-unit cost of land and improvements. Density standards are decisive in the supply of affordable housing in a community, particularly affordable rental housing. Reasonable density standards allow for a variety of housing options to meet the needs of all income and age groups, ensuring diversity and housing choice within a community.

A summary of allowable residential densities by land use type for entitlement cities is shown in *Table 6*. All entitlement cities have Land Use Elements that allow a range of single-family (less than one unit/acre to 14 units/acre) and multifamily (6 units/acre to 50 units per acre) uses. Special high density, 50 units plus is not allowed in Sandy or Taylorsville.

**Table 6
Land Use Categories and Permitted Density for Entitlement Cities**

Land Use By Density	Density Range	Salt Lake	Sandy	Taylorsville	South Jordan	West Jordan	West Valley
Single-Family							
Estate	Less one unit/acre	Yes	Yes	Yes	Yes	Yes	Yes
Low	1-3 units/acre	Yes	Yes	Yes	Yes	Yes	Yes
Medium	3-6 units/acre	Yes	Yes	Yes	Yes	Yes	Yes
High	6-14 units/acre	Yes	Yes	Yes	Yes	Yes	Yes
Multi-family							
Low	6 to 15 units/acre	Yes	Yes	Yes	Yes	Yes	Yes
Medium	15 to 20 units/acre	Yes	Yes	Yes	Yes	Yes	Yes
High	20 to 30 units/acre	Yes	Yes	Yes	Yes	Yes	Yes
Very High	30 to 50 units/acre	Yes	Yes	Yes	Yes	Yes	Yes
Special High	50+ units/acre	Yes	No	No	Yes	Yes	Yes

Source: BEBR Survey.

While all cities allow a wide range of residential densities, in actual practice approved densities show that, in fact, high density single-family development may be limited. For example, *Figures 1-6* map single-family residential parcels by density. The parcels are categorized by size and arranged by quartile. In Salt Lake City three quarters of all residential lots are less than two tenths of an acre while in South Jordan barely one quarter of all lots are less than two tenths of an acre.

The darker shade shows lower density areas of a city. Salt Lake City’s low density housing is clustered along the east bench. In Sandy low density is confined to the southeast sector while in South Jordan low density dominates the city, with the exception of extreme west side (west of Bangerter Highway). Taylorsville, West Jordan, and West Valley City have a mix of low and high

density parcels spread through their respective cities. The median lot size for each city was calculated and is indicative of the availability of affordable housing. The larger the median lot size the more unlikely the availability of affordable housing. The ranking of small to large median lot size for the entitlement cities in Salt Lake County are: Salt Lake City .15 acre, West Jordan .17 acre, Taylorsville .18 acre, West Valley .19 acre, Sandy City .22 acre, and South Jordan .28 acre.

Figure 1
Residential Parcels by Size, Salt Lake City
 (2011)

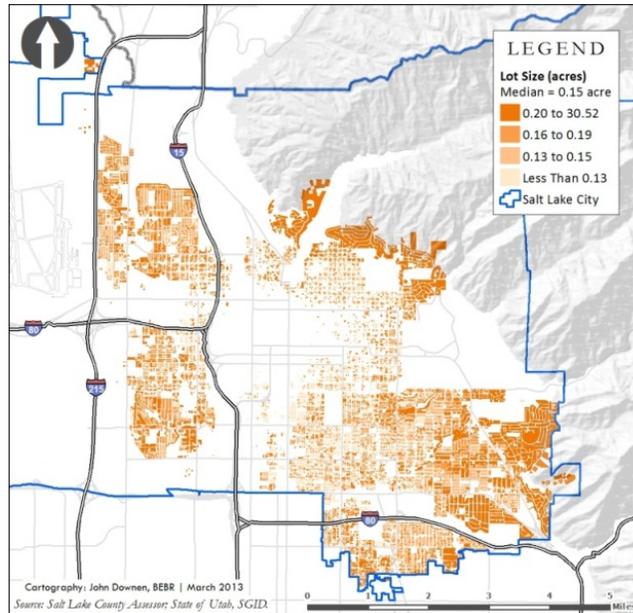


Figure 2
Residential Parcels by Size, Sandy City
 (2011)

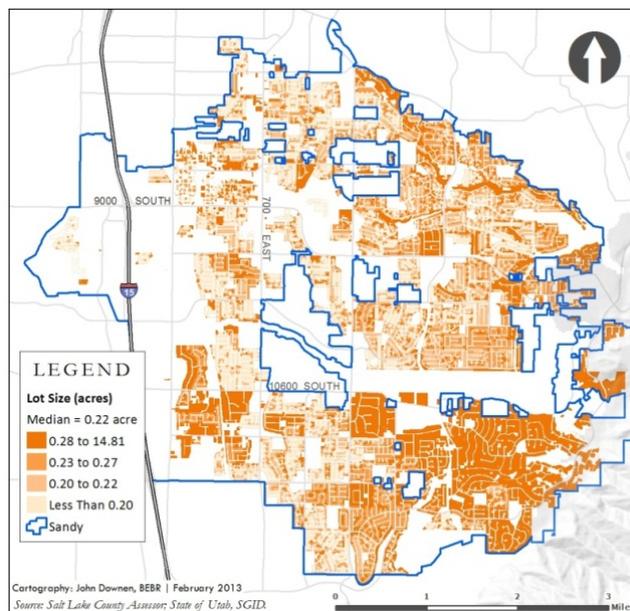


Figure 3
Residential Parcels by Size, South Jordan City
 (2011)

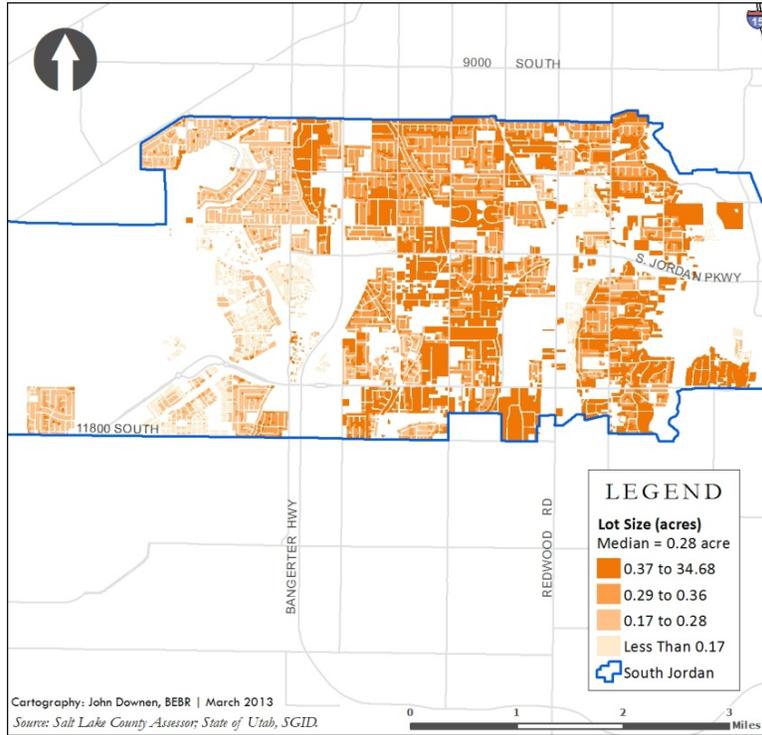


Figure 4
Residential Parcels by Size, Taylorsville
 (2011)

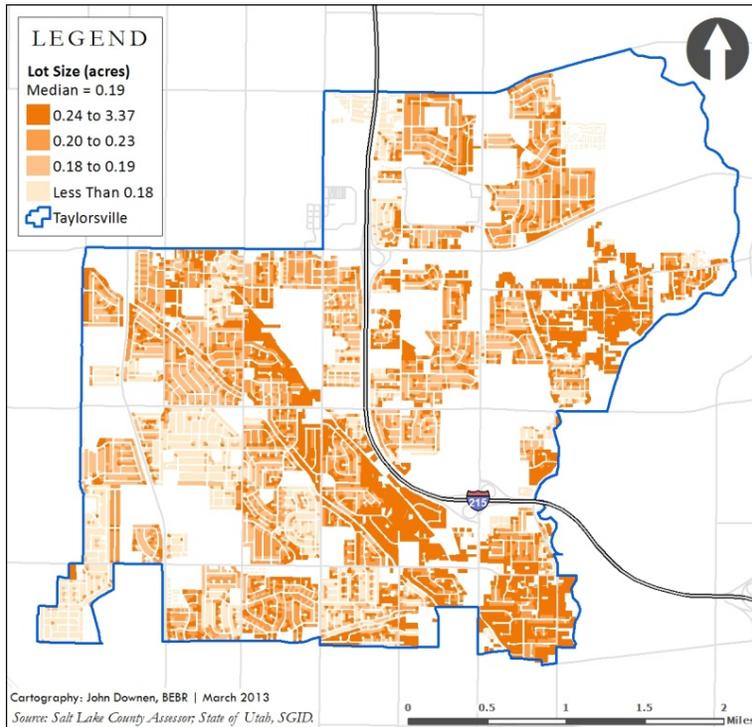


Figure 5
Residential Parcels by Size, West Jordan
 (2011)

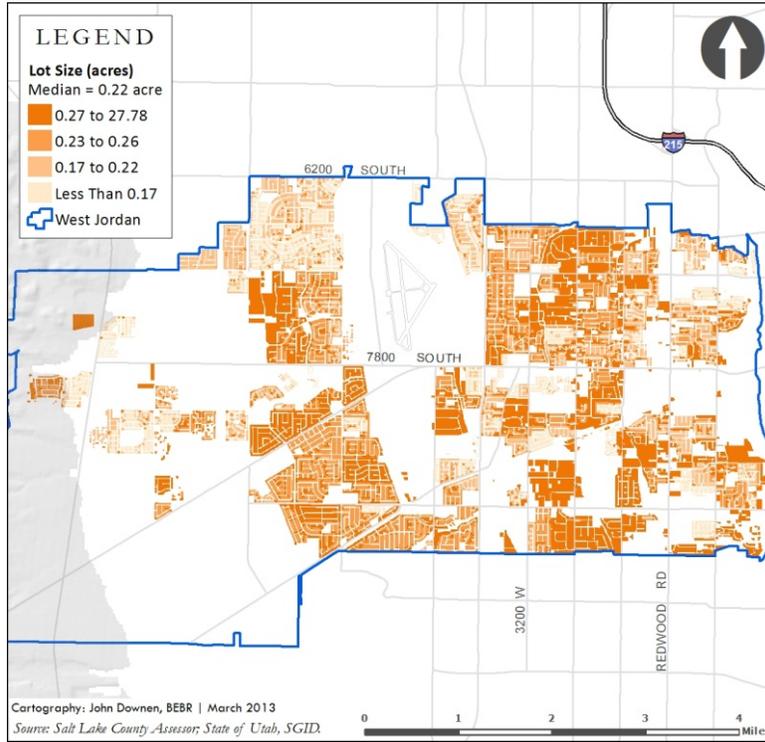
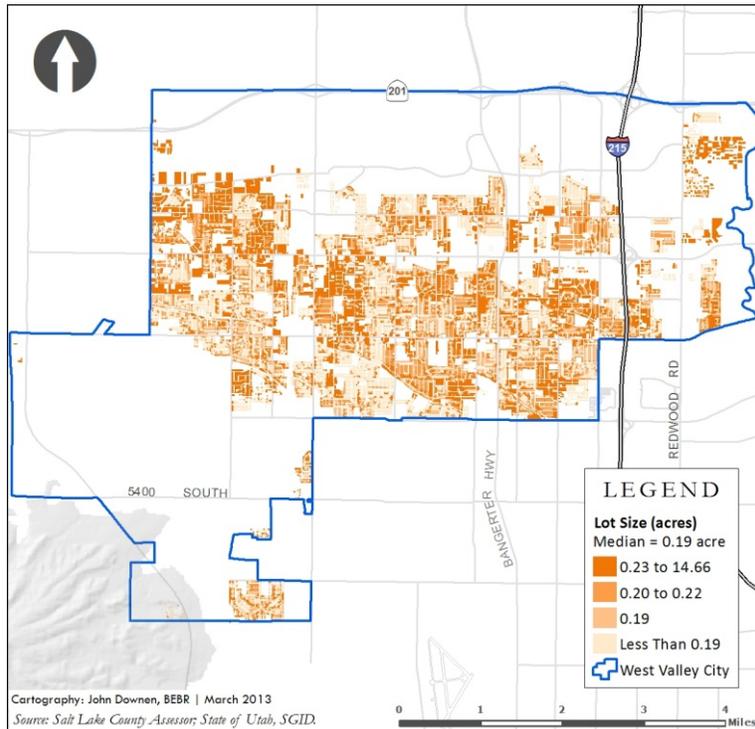


Figure 6
Residential Parcels by Size, West Valley City
 (2011)



Zoning Ordinance

Zoning ordinances are the tools that cities use to implement the General Plan. A zoning ordinance classifies the specific and immediate use of land. The primary purpose of zoning is to control land use and preserve “community character.” Consequently, zoning determines the location, type and character of housing development, and frames housing policies and procedures. Thus the impact of zoning on housing choice is extensive. Several aspects of zoning ordinances that may affect a person’s access to housing or limit the range of housing choices available are:

- Definition of Family
- Density Bonus Ordinance
- Variety of Housing Opportunity
- Public Policies
- Accessory Units
- Inclusionary Zoning.

Definition of Family – A city’s zoning ordinance could potentially limit access to housing for some households if they failed to meet the definition of a family. Five of the six entitlement cities have defined families in their zoning ordinance. Only West Valley City has not defined family. The remaining four cities specify how family members are related; by blood, marriage, adoption or legal guardian. Utah courts have not ruled on potentially discriminatory aspect of family definitions but some state courts have. For example California courts have ruled that a definition of “family” that: (1) limits the number of persons in a family, (2) specifies how members of the family are related or (3) a group of not more than a certain number of unrelated persons as a single housekeeping unit, is invalid. Court rulings state that defining a family does not serve any legitimate or useful objective or purpose under the zoning and land planning powers of a city or county.

West Valley City has the least potential of housing discrimination based on definitions of family although none of the reporting entitlement cities limit the number of individuals in a related family *Table 7*. The number of unrelated persons is limited in five of the six entitlement cities. Salt Lake City allows only three unrelated person to live together but certainly this provision is not enforced. The number of student households near the University of Utah certainly must have many cases of more than three unrelated individuals living together in detached single-family units. Generally, the definition of family in zoning ordinances in the entitlement cities of Salt Lake County do not appear to be an impediment or threat to fair housing choice.

Table 7
Zoning Ordinance: Definition of Family

	Salt Lake	Sandy	South Jordan	Taylorsville	West Jordan	West Valley
Definition of Family	yes	yes	yes	yes	yes	none
Limit number in related family	no	no	no	no	no	no
Specify how related	yes	yes	yes	yes	yes	no
Limit number unrelated persons	3	4	yes	4	5	no
	persons	persons		persons	persons	

Source: Survey of cities by Bureau of Economic and Business Research, University of Utah.

Selected Zoning Incentives and Impediments – None of the entitlement cities in Salt Lake County have adopted an array of incentives for affordable housing. Inclusionary zoning, fee waivers, accessory units, and density bonuses for low-income housing are omitted from zoning ordinances and practices of entitlement cities *Table 8*. The lack of support in including incentives is an

impediment to expanding the supply of affordable housing and affirmatively furthering fair housing choice.

All entitlement cities have RDAs with tax increment financing (TIF) set-asides for affordable housing. However, the only cities to actively use this tool to date are Salt Lake City, West Jordan, and South Jordan. TIF revenues are potentially significant source of funds for the development of affordable housing. Most recently South Jordan and Utah Nonprofit Housing formed a public-private partnership to use some of the city's TIF revenues for the development of a tax credit senior project. Creating innovative ways to use TIF revenues to support affordable housing should be a high priority for cities.

Planners of each entitlement city were asked to identify the most serious impediment to increasing the inventory of affordable housing in their cities. Surprisingly, only one city, Sandy, named Nimbysism as the chief impediment. Salt Lake City, Taylorsville, and West Jordan all identified market conditions—land prices, construction costs, etc.—as the biggest impediment. West Valley City reported impediments are minimal for development.

Variety of Housing Opportunity – To ensure fair housing choice in a community the zoning ordinances should provide for a range of housing types from low density single-family to high density apartment communities to residential care facilities to manufactured housing to transitional housing. The full range of housing types are shown in *Table 9* along with the survey results from each entitlement city.

Of the entitlement cities Salt Lake City is the most accommodating of housing variety. Permitted uses are available for all types of housing with the exception of residential care facilities (6 or more residents) and emergency shelters, which require conditional use permit. Sandy City has permitted use for only single-family and multi-family units, all other housing types either required conditional use permit or are excluded. Taylorsville, surprisingly, requires conditional use permits for almost all types of housing. In West Jordan conditional use permits are required for accessory units, mobile parks, large residential care facilities and transitional housing. SROs, supportive housing, and emergency shelters are excluded. West Valley City is similar to Salt Lake City in its more comprehensive permitted uses. All types of housing have permitted use in appropriate zones only accessory units and emergency shelters are excluded.

The relatively extensive requirement of a conditional use permit or exclusion of specific types of housing; primarily accessory units, mobile home parks, large residential care facilities, manufactured housing, transitional housing and emergency shelters, limits housing choice for some households. The above listed housing types are predominately types of housing used by low-income households, households with disabilities, and minority and Hispanic households. The zoning ordinances of Sandy, Taylorsville, and West Jordan do pose potential impediments to fair housing choice of protected classes.

Table 8
Zoning Provisions Favorable to Affordable Housing

	Salt Lake	Sandy	South Jordan	Taylorsville	West Jordan	West Valley
Inclusionary Zoning	no	no	no	no	no	no
Accessory Units	no	no	yes	no	no	No
Density Bonus for Low-Income Housing	no	no	no	no	no	no
RDA with TIF for Affordable Housing	yes	yes	yes	yes	yes	yes
Top Ranked Impediments to Expanding Housing Opportunities						
Existing Zoning			2			
Market Conditions	•			•	•	
Nimbyism		•	1			
Impediments minimal						•
Other						

Source: Survey of cities by Bureau of Economic and Business Research, University of Utah.

Table 9
Variety of Housing

	Salt Lake	Sandy	South Jordan	Taylorsville	West Jordan	West Valley
Single-Family	P	P	P	P/ C	P	P
Multi-family	P	P	P	P/C	P	P
Second or Accessory Unit	P in limited areas	C	P	C	C	E
Mobile Home Park	P (in only one MH zone)	C	E	C	C	P
Manufactured Housing	P (design requirements)	P/C	P	P/C	P	P
Residential Care Facilities (6 or fewer)	P	P/C	P	P/C	P	P
Residential Care Facilities (6 or more)	C	P/C	P	P/C	C	P
Emergency Shelters	C	E	E	E	E	E
Transitional Housing	P	C	P	C	C	P
Supportive Housing	P	C	P	C	E	P
SRO	P	E	P	P/C	E	P

P=permitted, C=Conditional Use and E=Excluded

Source: Survey of cities by Bureau of Economic and Business Research, University of Utah.

Siting of Rental Communities – Most important is zoning’s impact on the siting of housing. Where housing will be located, and has been located, is a critical factor affecting housing choice in Salt Lake County. Zoning determines where assisted and affordable housing is located. Zoning decisions underlie the county’s housing patterns, which in turn determine concentrations of protected classes in certain areas of the county.

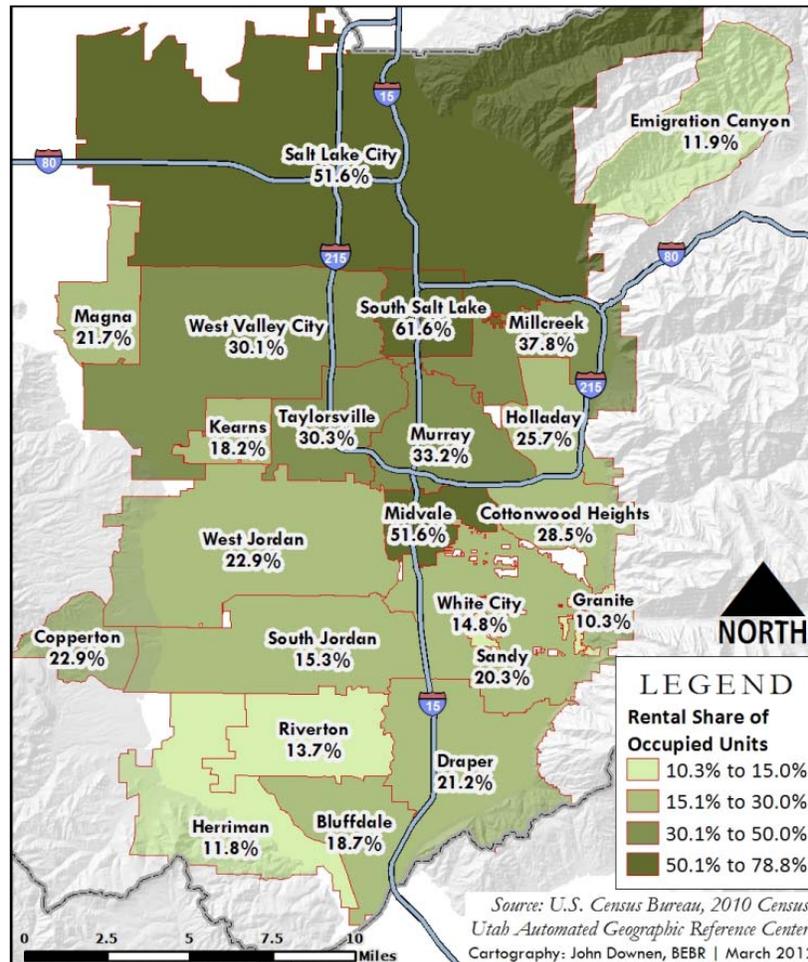
The “friendliness” of local zoning ordinances to rental housing is shown by occupancy data *Table 10*. In 2010, in Salt Lake County, 32.7 percent of all occupied units were renter units. However, only four of fifteen cities in the county exceeded the countywide share of 32.7 percent renter occupied units; South Salt Lake 61.6 percent, Salt Lake City 51.6 percent, Midvale 51.6 percent, and Murray 33.2 percent *Figure 7*. These data indicate an uneven distribution of rental units in Salt Lake County, a distribution that has persisted for some time. In both 1990 and 2000 the same cities had a disproportionate share of rental housing.

Table 10
Renter Occupied Units as Share of Total Occupied Units

	1990	2000	2010
Bluffdale		7.3%	18.7%
Cottonwood Heights		NA	28.5%
Draper	19.5%	16.2%	21.2%
Herriman		6.2%	11.8%
Holladay		18.1%	25.7%
Midvale	59.5%	51.9%	51.6%
Murray	39.0%	33.3%	33.2%
Riverton	10.1%	6.0%	13.7%
Salt Lake City	50.6%	48.8%	51.6%
Sandy	12.7%	15.7%	20.3%
South Jordan	8.9%	10.3%	15.3%
South Salt Lake	61.1%	62.0%	61.6%
Taylorsville		28.8%	30.3%
West Jordan	21.2%	18.1%	22.9%
West Valley City	32.7%	27.4%	30.1%
Kearns CDP	14.4%	14.6%	18.2%
Magna CDP	18.6%	11.2%	21.7%
Salt Lake County	34.9%	31.0%	32.7%

Source: U.S. Census Bureau.

Figure 7
Rental Share of Occupied Units by City



Although, it's important to note a positive development; most cities have increased their share of rental housing over the past ten years. In most cases the increases have been in the 3 to 5 percent range, relatively small, but in the right direction. The increase in the share of renter occupied units, however is not solely due to the development of new apartment communities but rather the renting of single-family homes, condominiums, and town homes.

Over the decade the number of renter-occupied units in Salt Lake County increased by 20,659 units. New construction of apartment units added 11,047 units, or only 53 percent of all additional rental units. The remaining 47 percent was due to the rental of units originally intended for home ownership; condominiums, town homes, twin homes, and single-family homes.

Renting homes and condominiums played even a larger role in adding to rental units in entitlement cities like Sandy, Taylorsville and West Valley City *Table 11*. This trend has implications for protected classes and housing choice. Generally, rental homes and condominiums carry higher prices. This hurts affordability and effectively excludes many protected classes from rental opportunities in these cities. Therefore the increasing share of rental occupied units in most cities may not have expanded housing choice much for protected classes.

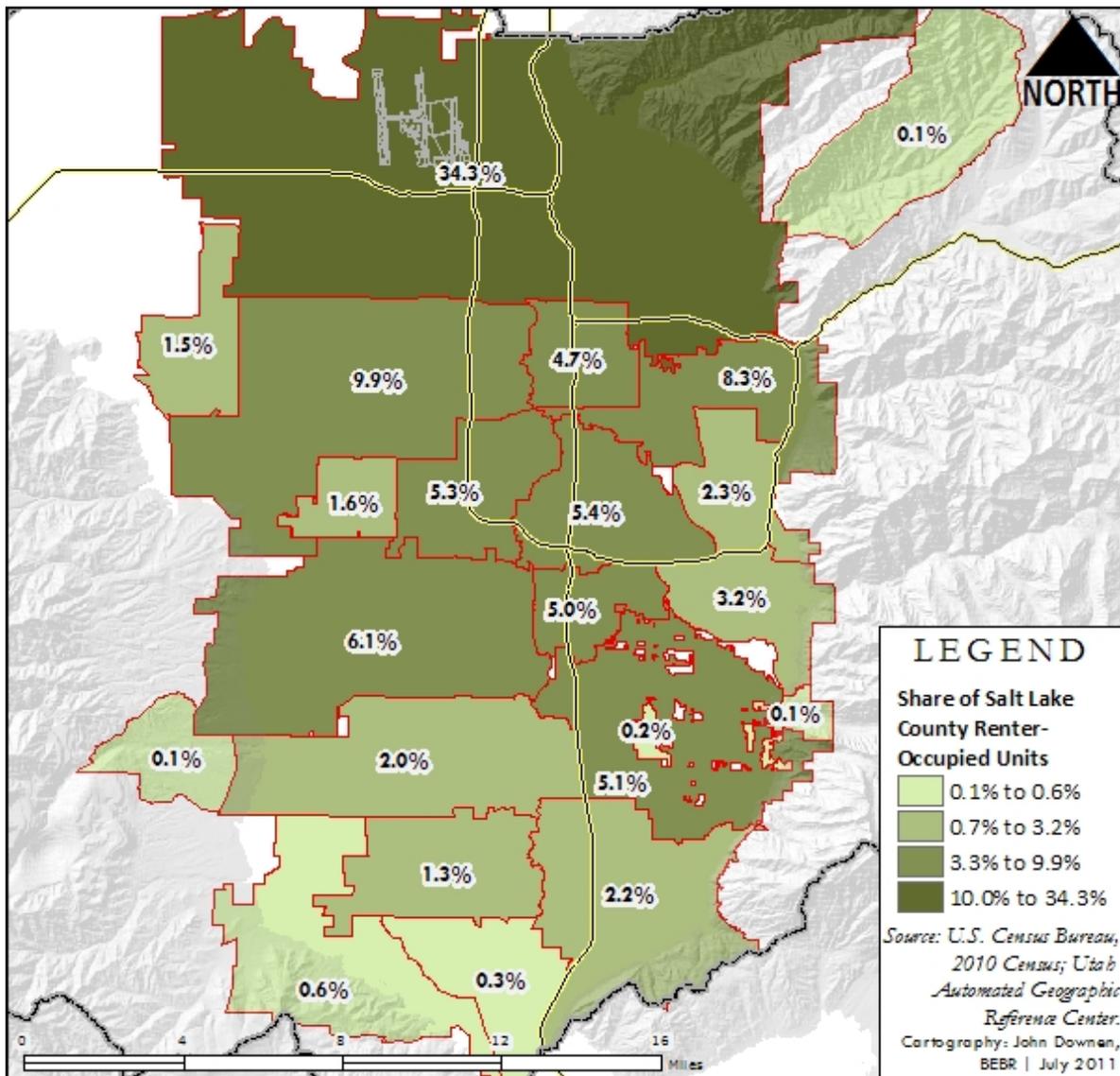
Table 11
New Apartments Units as a Percent of Increase in Renter Occupied Units

	Renter Occupied Units 2000	Renter Occupied Units 2010	Absolute Chg.	New Apt. Units	New Apt. Units as % of Chg
Bluffdale	81	368	287	190	66.2%
Cottonwood Heights	Unincorporated	---	---	---	NA
Draper	1,020	2,448	1,428	526	36.8%
Herriman	27	652	625	NA	NA
Holladay	922	2,547	1,625	10	0.6%
Midvale	524	5,628	5,104	938	18.4%
Murray	4,225	6,057	1,832	126	6.9%
Riverton	382	1,430	1,048	648	61.8%
Salt Lake City	34,869	38,440	3,571	2,658	74.4%
Sandy	4,029	5,737	1,708	528	30.9%
South Jordan	773	2,196	1,423	797	56.0%
South Salt Lake	4,972	5,267	295	166	56.3%
Taylorsville	5,328	5,982	654	217	33.2%
West Jordan	3,419	6,825	3,406	2,195	64.4%
West Valley City	8,835	11,164	2,329	541	23.2%
Salt Lake County	91,544	112,203	20,659	11,047	53.5%

Source: U.S. Census Bureau and Bureau of Economic and Business Research, University of Utah.

Rental housing is a primary source of housing for protected classes. However, rental housing in Salt Lake County is highly concentrated in a few cities, thus limiting housing choice for members of protected classes. One-third of all rental housing in the county is located in Salt Lake City *Figure 8*. Forty-five percent of rental units are located in Salt Lake City and West Valley City. It is not that other cities are not suitable for rental housing due to market conditions, proximity to transportation networks, or employment centers. These conditions are met in most cities in Salt Lake County. The uneven distribution of rental housing population in the county is due to zoning ordinances reinforced by Nimbyism *Figure 9*. Salt Lake City has a renter population of 85,757, about six times as many as Sandy City with 15,814.

Figure 8
Share of Salt Lake County Renter Households by City



Siting of Rent Assisted Rental Units - Zoning's impact on the siting of subsidized and assisted rental units has led to greater concentrations of protected classes in the county. Of the 9,000 tax credit units in Salt Lake County 4,500 are located in Salt Lake City. Seventy percent of all tax credit units are located in three cities, Salt Lake, West Valley City, and West Jordan Table 12 and Figure 10. The map also shows the location of public housing and project based apartment communities. Tables 13-15 identify all assisted units in Salt Lake County.

Figure 9
Renter Population by City

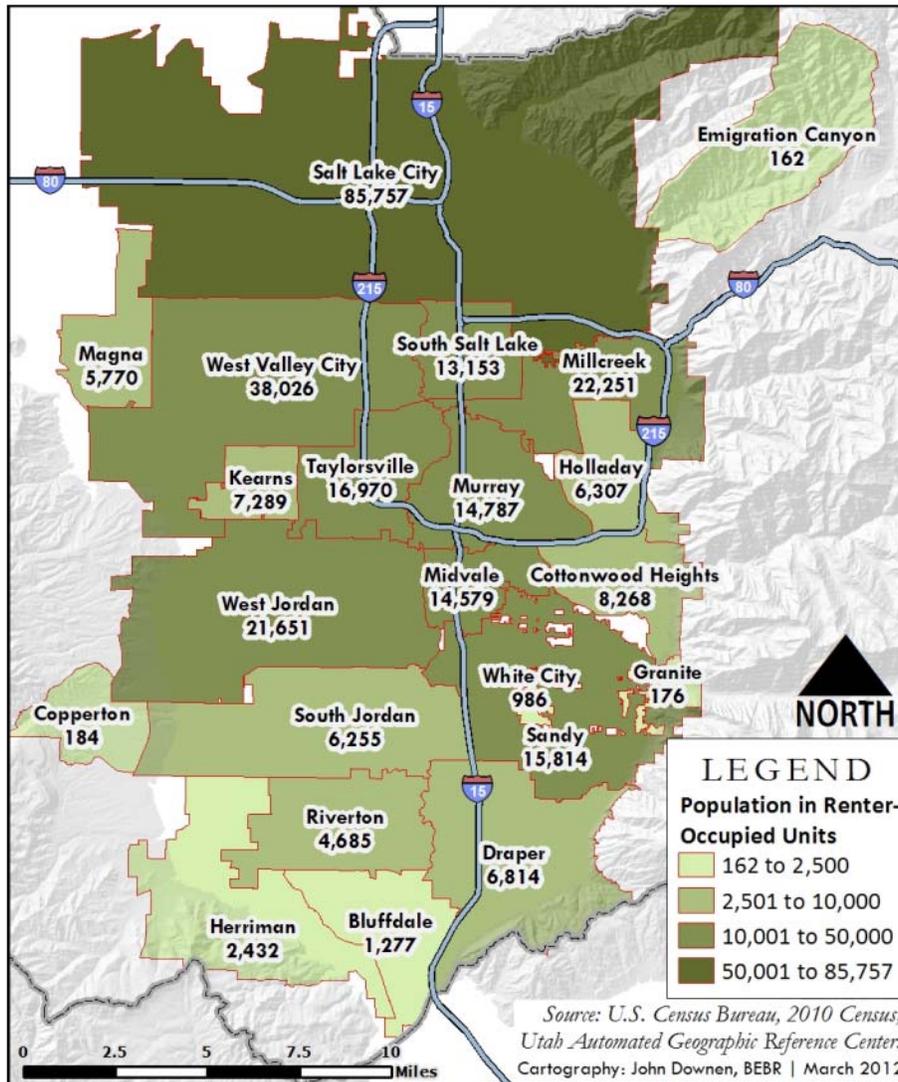
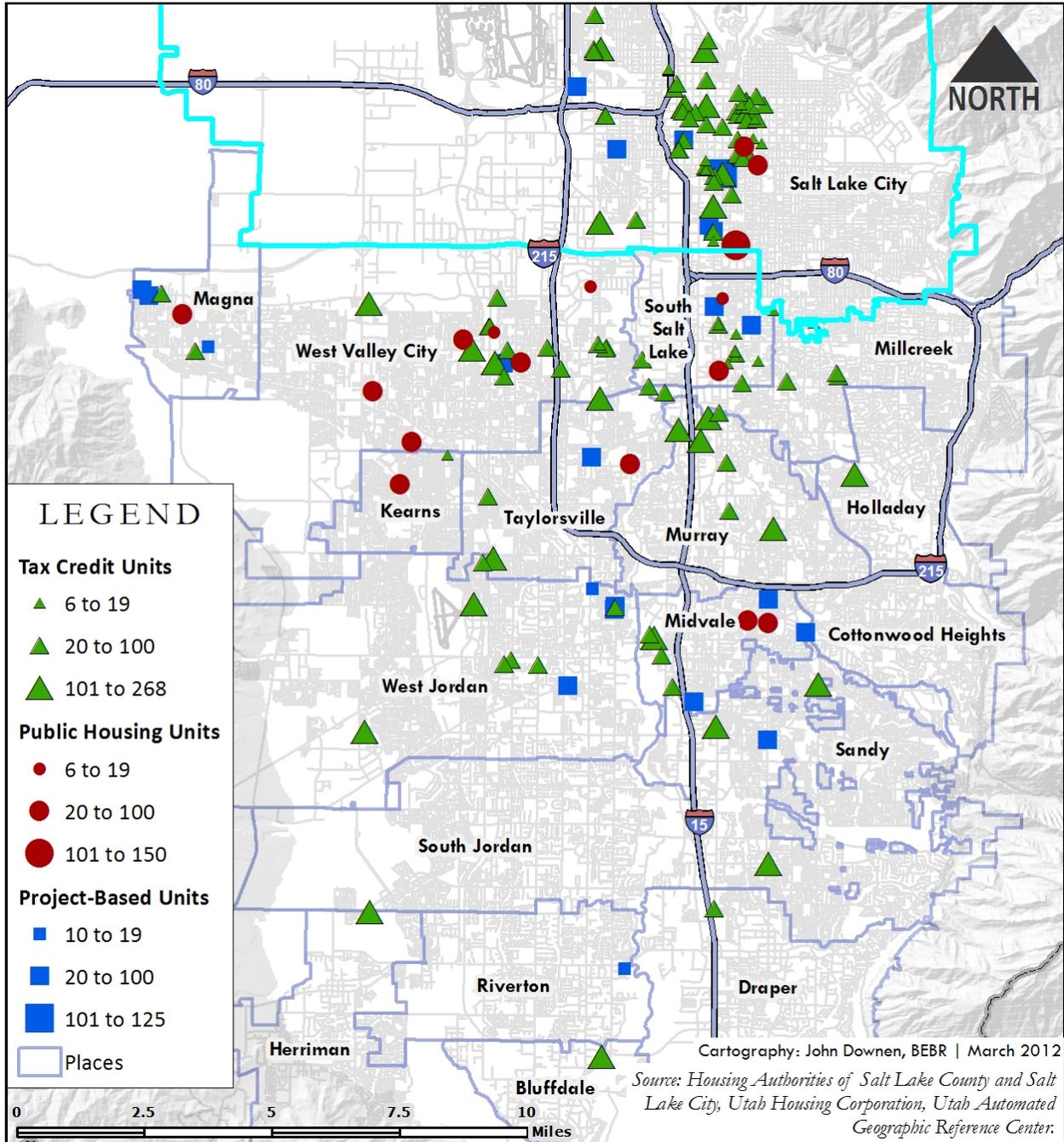


Table 12
Tax Credit Units by City

City	Units	% Share
Bluffdale	168	1.8%
Draper	80	0.9%
Herriman	258	2.8%
Holladay	133	1.5%
Kearns	9	0.1%
Magna	164	1.8%
Midvale	381	4.2%
Murray	609	6.7%
Salt Lake	4,515	49.6%
Sandy	215	2.4%
South Salt Lake	181	2.0%
Taylorsville	331	3.6%
West Jordan	813	8.9%
West Valley	1238	13.6%
County Total	9,095	100.0%

Source: Utah Housing Corporation.

Figure 10
 Locations of Subsidized and Assisted Apartment Communities, 2011



**Table 13
Tax Credit Projects in Salt Lake County**

Project	Address	City	Units
Bluffs Apartments	14035 S Marketview Drive	Bluffdale	168
Heritage Apartments - Draper	11715 S. State Street	Draper	80
Timbergate Apartments	5401 West 11800 South	Herriman	258
Hidden Meadows Apartments	1794 E Hidden Meadows Drive	Holladay	133
St. Andrews Park II	4236 W Old Miller Court	Kearns	9
Heritage Apartments - Magna	3544 S Kingsburg Cove (8177 W)	Magna	76
Coppertree Apartments	8650 W Coppertree Lane	Magna	88
Mill Creek Apartments II	759 W Center Street	Midvale	54
LifeStart Village	8221 S Allen Street	Midvale	37
Florentine Villas Apartments	7497 Siena Vista Lane	Midvale	214
Tuscany Villas Senior Apartments	7442 S. Bingham Junction Blvd.	Midvale	76
Villas at Vine Street	801 E Vine Street	Murray	102
Iris Apartments	4865 S. State Street	Murray	31
Park Gate Apartments	5491 Jackie's Way	Murray	80
Frontgate Apartments	4623 S. Urban Way	Murray	128
Miller Fireclay Apartments II	120 West Fire Clay Avenue	Murray	268
Trenton Apartments	544 E 100 S	Salt Lake City	37
Hartland Apartments	1600 W 1700 S	Salt Lake City	120
Statesman Apartments	155 S 400 E	Salt Lake City	19
Hidden Oaks Apartments	3477-3491 S 200 E	Salt Lake City	16
Cliffside Apartments	720 N Wall Street	Salt Lake City	22
Ritz Apartments	435 E S Temple	Salt Lake City	30
Ashby Apartments	358 E 100 S	Salt Lake City	27
New Grand Hotel	7 E 400 S	Salt Lake City	80
Ivanhoe Apartments	417 E 300 S	Salt Lake City	19
Meredith Apartments	160 E 1st Ave	Salt Lake City	22
Hidden Oaks IV	594 N Redwood Road	Salt Lake City	64
Granite Park Condo	3537 S 500 E	Salt Lake City	9
Wandamere Place Apartments	2870 S 700 E	Salt Lake City	10
Hidden Oaks II	3445-3469 S 200 E	Salt Lake City	28
Riverwood Cove Apartments	592 N. Riverside Drive	Salt Lake City	110
Country Oaks I	337 N 700 W	Salt Lake City	7
Riverside Cove	558-560 N Redwood Road	Salt Lake City	28
Rio Grande Hotel	428 W 300 S	Salt Lake City	49
Smith Apartments	228 S 300 E; 688 & 682 E 700 S	Salt Lake City	38
Millcreek Meadows	885 E. Meadow Pine Court	Salt Lake City	56
Holladay Hills I	3714 S Highland Drive	Salt Lake City	70
Country Oaks II	325-331 N 700 W	Salt Lake City	17
Parkway Commons	875 W Meadowbrook Expressway	Salt Lake City	81
Cedar Crest Apartments	1926 S. W Temple	Salt Lake City	12
Holladay Hills II	3678-3680 S Highland Drive	Salt Lake City	60
Pauline Downs Apartments	110 S 300 E	Salt Lake City	112
CW Development	307-319 E 600 S	Salt Lake City	16
Art Space II	353 W 200 S	Salt Lake City	53
Lowell Apartments	756 S 200 E	Salt Lake City	80
Riverview Townhomes	1665 S Riverside Drive	Salt Lake City	61
Robert A Willey Apartments	543 & 547 S 400 E	Salt Lake City	7
Bradley Apartments	355 N 700 W	Salt Lake City	6
Palladio Apartments	360 S 200 W	Salt Lake City	36
Valley Woods	3610 S 1000 W	Salt Lake City	41
Aspen View	1230 E. Elgin Street	Salt Lake City	16
Huntsman	322 E 300 S	Salt Lake City	36

(Con't) Project	Address	City	Units
Safe Haven I	550 W 700 S	Salt Lake City	22
Hidden Oaks VII	3427 S 200 E	Salt Lake City	6
Bridge Projects	511 W 200 S	Salt Lake City	62
Jefferson School Apartments	1099 S. West Temple	Salt Lake City	36
Northgate Apartments	135 & 55 S 500 W	Salt Lake City	159
Wendell Apartments	204 W 200 N	Salt Lake City	32
Trolley Lane & Lincoln Arms	518 E 600 S & 242 E 100 S	Salt Lake City	33
Wilford Apartments	932 S 200 W	Salt Lake City	14
Escalante III Apartments	1040 N Redwood Road	Salt Lake City	80
Old Kent Apartments	832 S 200 W	Salt Lake City	7
Westgate Apartments (SLC)	264 S Foss Street	Salt Lake City	60
Wolfson West Apartments	936 S 200 W	Salt Lake City	14
Capitol Villa Apartments	239 W 600 N	Salt Lake City	108
Safe Haven II	556 W 700 S	Salt Lake City	20
Bigelow Apartments	225 S 400 E	Salt Lake City	45
Sophie Apartments	925 S 200 W	Salt Lake City	25
Westgate II Apartments	273 S Foss Street	Salt Lake City	32
Trenton Apartments	544 E 100 S	Salt Lake City	37
Liberty Metro	555 S 200 E	Salt Lake City	83
James Kier Senior Apartments	260 East 800 South	Salt Lake City	51
Dominguez Park III Apartments	3970 S 700 W	Salt Lake City	60
Pittsburgh House Lofts	950 S 200 W	Salt Lake City	12
Citifront Apartments	641 W North Temple	Salt Lake City	95
Liberty Midtown	225 S 300 E	Salt Lake City	65
Edison Place Apartments	128 E 1300 S	Salt Lake City	95
Ritz Apartments	435 E S Temple	Salt Lake City	30
Ashby Apartments	358 E 100 S	Salt Lake City	27
Sunrise Metro Apartments	580 S 500 W	Salt Lake City	100
Stratford Hotel	169 E 200 S	Salt Lake City	46
SoDo Lofts	938 S Washington Street	Salt Lake City	18
Multi-Ethnic Senior Citizen Highrise	120 S 200 W	Salt Lake City	141
Jefferson School Apartments Phase II	1011 S. West Temple	Salt Lake City	48
Park Place at City Centre	731 S 300 E	Salt Lake City	224
Towne Gate Apartments	1450 S. West Temple	Salt Lake City	268
Palmer Court	999 S. Main St.	Salt Lake City	141
Peter Pan Apartments	445 E 300 S	Salt Lake City	32
Piccardy Apartments	115 S 300 E	Salt Lake City	40
Liberty CityWalk	210 South 300 East	Salt Lake City	73
Taylor Springs	1812 S. West Temple	Salt Lake City	95
Riverwood Cove Apartments	582 N. Riverside Drive	Salt Lake City	110
Smith Apartments	228 S 300 E & 682-688 E 700 S	Salt Lake City	38
Providence Place Apartments	309 East 100 South	Salt Lake City	125
Rendon Terrace Apartments	158 North 600 West	Salt Lake City	70
Birkhill Apartment Homes	4221 South Main Street	Salt Lake City	96
Woodruff Apartments	235 South 200 East	Salt Lake City	45
Liberty Heights Apartments	8176 S 1300 E	Sandy	104
Silver Pines Sr. Apartments	735 E 11000 S	Sandy	111
Stonecrest PUD	211 E Crestone Avenue	South Salt Lake City	16
Gregson Apartments	19 W Gregson Avenue	South Salt Lake City	16
Frontier Transitional Housing	3579 S State Street	South Salt Lake City	15
Villa Charmant Apartments	3837 S 300 E	South Salt Lake City	54
Grace Mary Manor	19 W Gregson Avenue	South Salt Lake City	80
Mulberry Park	5287 S 3600 W	Taylorsville	80
Bridgeside Landing	556 W 4500 S	Taylorsville	150
Legacy Village Apartments	6256 S. Gold Medal Drive	Taylorsville	101

(Con't) Project	Address	City	Units
Hidden Oaks V	6330 Dixie Drive	West Jordan	96
Avion Townhomes	7905 S Old Bingham Highway	West Jordan	55
Ridge at Jordan Landing	3818 W Castle Pines Way	West Jordan	264
Jordan River Apartments	7915 South 2700 West	West Jordan	42
Spring Hollow Apartments (West Jordan)	7011 S 1300 W	West Jordan	44
Sunset Ridge Apartments	5503 W 9000 S	West Jordan	240
West Jordan Senior Housing II	7832 South 3200 West	West Jordan	72
Hidden Oaks III	1511-1631 W 3395 S	West Valley City	16
Lexington Park Apartments	2293 W. Lexington Park Avenue	West Valley City	80
Ridgeland Apartments	2685 S. Ridgeland Park Dr (3450 W)	West Valley City	64
Harmony Gardens	3125 S 3600 W	West Valley City	96
Compass Townhomes	3306 W 3500 S	West Valley City	34
Victoria Woods Sr Apartments	3510 W Lancer Way (3650 S)	West Valley City	104
Compass Court Townhomes	1484 W 3500 S	West Valley City	40
Compass Villa	1466 W 3500 S	West Valley City	55
Westland Cove	2560 W. Mockingbird Way	West Valley City	40
Valley Horizons	3133 S 3600 W	West Valley City	20
Campbell Court	1596 W 3395 S	West Valley City	26
Boulder Pines	4040 S 1535 W	West Valley City	160
Willow Park Apartments	3363 W 3800 S	West Valley City	88
Tuscany Cove Apartments	3856 W 3500 S	West Valley City	252
Kelly Benson Apartments	3122 South 3600 West	West Valley City	59
Liberty Commons	2785 S. Winsted Way	West Valley City	104
Total			9,095

Source: Utah Housing Corporation

Table 14
Public Housing in Salt Lake County

Project	Address	City	Units
Senior High Rise	1966 & 1992 South 200 East	Salt Lake City	149
Valley Fair Village	3060 West 3650 South	West Valley	100
Harmony Park	3686 South Main	Unincorporated	20
Union Apartments	7245 South 700 East,	Midvale	30
Midvale Solar	380 East 7200 South	Midvale	24
Erin Meadows	1145 West 4835 South	Taylorsville	34
Academy Park	4605 South 4800 West	West Valley	24
Hunter Hollow	4005 South 5425 West	West Valley	20
Cyprus Park	2983 South 8400 West	Unincorporated	28
Westlake Apartments	3520 West 3235 South	West Valley	10
Granger Apartments	3348 South 4000 West	West Valley	24
Kearns Mountain View Apts.	5100 South 4950 West	Unincorporated	32
Sixplex	25 East Southgate (2735 South)	South Salt Lake	6
Fourplex	1739 West Lake Park (2565 South)	West Valley	8
Total			509

Source: Housing Authority of the County of Salt Lake, Housing Authority of Salt Lake City and Housing Authority of West Valley.

Spatial Distribution of Section 8 Vouchers - It's no surprise that the location of Section 8 voucher holders mirror the spatial distribution of rental units; both market and rent assisted units *Figure 11*. Again, zoning ordinances and development patterns reinforce segregation of low-income renters who are predominately protected classes; minorities, the disabled, large renter families, and single-parent households confining a majority of these renters to west Salt Lake City, South Salt Lake, West Valley City, and Midvale.

**Table 15
Project Based Apartments in Salt Lake County
(Includes HUD 202)**

Project	Address	City	Units
Jerald Merrill	8923 West 2700 South	Magna	29
Justin Stewart	7986 West 3500 South	Magna	11
Magna Housing	2971 South 8400 West	Magna	10
Martha's Terrace	2617 South 9040 West	Magna	30
Midshore Manor	8527 Judy Drive	Midvale	86
Oquirrh Ridge	6854 South 700 East	Midvale	24
Sweet Charity	7351 Union Park Ave.	Midvale	50
Operation Conquest	1150 West 12645 South	Riverton	15
Willowood	9075 South 700 East	Sandy	84
100F Tower	85 West Sunset Ave.	South Salt Lake	28
St. Mark's Millcreek	418 East Front Ave.	South Salt Lake	24
Taylorville Senior	4751 South Redwood Rd.	Taylorville	65
Cerebral Palsy of Utah	1666 West 6720 South	West Jordan	18
Geneva Village	1300 West 7000 South	West Jordan	40
Meadowview Apartments	1375 West 700 South	West Jordan	30
Parkway Village	7050 South 1300 West	West Jordan	28
West Jordan Seniors	2105 Sugar Factory Rd.	West Jordan	64
Gerald Wright Senior	3650 South 3375 West	West Valley City	79
Total			715

Source: HUD

RDAs, URAs, EDAs, and CDAs and Siting of Affordable Housing – Redevelopment Agencies have been an economic development tool in Utah since the passage of the Utah Community Development Act in 1965. One of the principal objectives of an RDA is to revitalize blighted areas through tax increment financing. Traditional RDAs are required to set aside 20 percent of their tax increment financing (revenue) for affordable housing. However, an RDA can choose to backload the required housing expenditure until near the end of the life of the RDA.

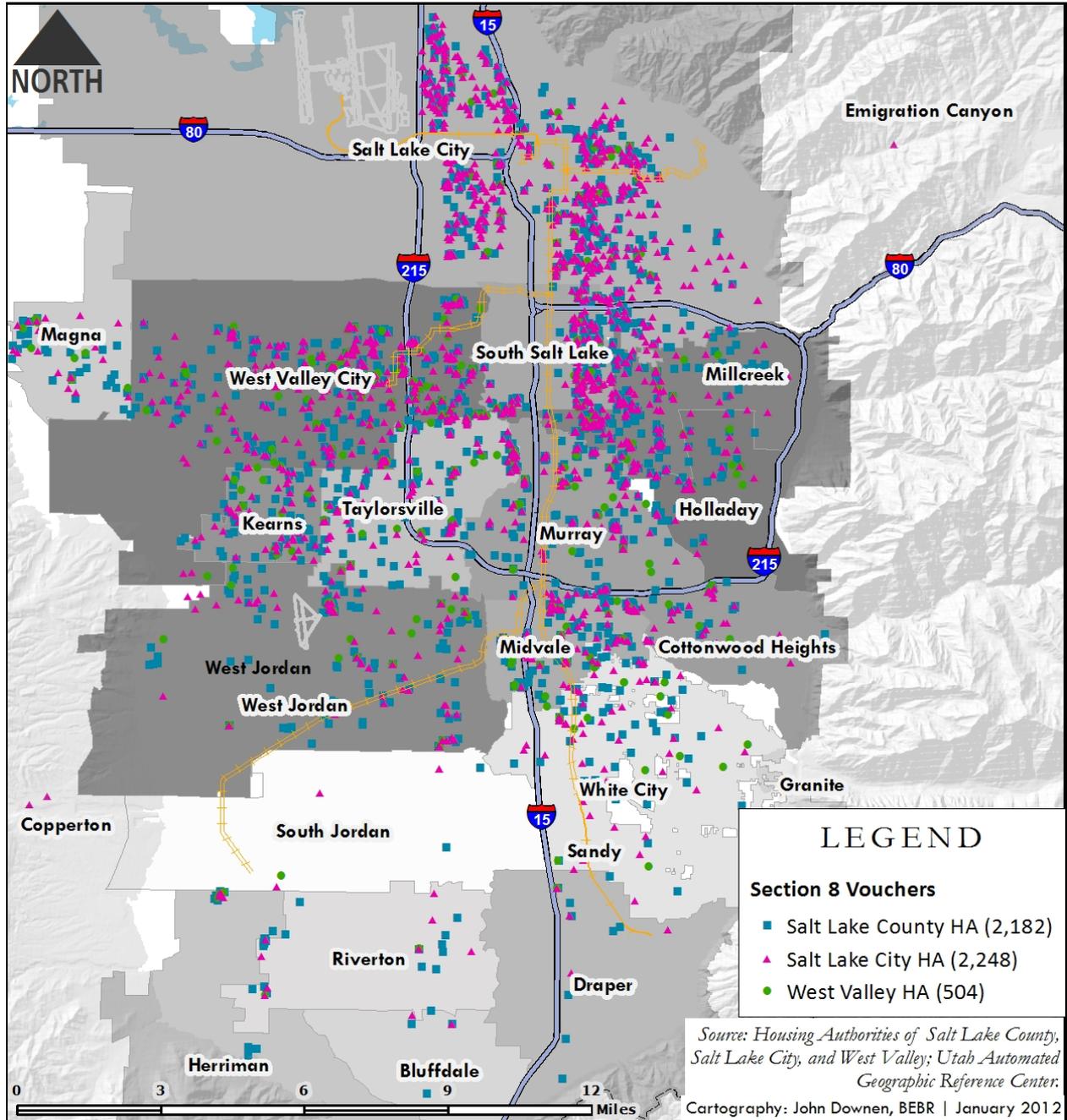
In recent years there have been amendments to the Community Development Act. In 2007 legislation allowed RDAs the authority to create three types of project areas; an Urban Renewal Area (URA), a Community Development Area (CDA), and an Economic Development Area (EDA). An URA's purpose is to remove blight, an EDA's purpose is to promote the creation of new jobs, and a CDA's purpose is to create a public benefit through community development. The affordable housing set-aside is still a component of an URA but not necessarily an EDA or CDA requirement. Consequently, affordable housing for some RDAs has slipped in priority.

Twelve cities, and Salt Lake County, have Redevelopment Agencies *Table 16*. These redevelopment agencies have assisted in the development of housing units for 2,000 families, 170 senior households, and 133 special needs households. There are 45 project areas in the twelve RDAs. These project areas when fully developed have the potential to generate over \$100 million in tax revenue for housing. Presently only about \$6 million of RDA revenue has been spent on housing.

While an RDA can be a crucial tool in providing funds for affordable housing and creating public-private housing partnerships the location of the subsequent affordable housing is restricted to the RDA's project area. As noted, most housing revenue is generated by traditional RDAs (prior 2007) and URAs. The purpose of these project areas is to remove blight and revitalize an area, partly through the development of affordable housing. Consequently, affordable housing is developed—a

good thing—but the housing will likely be developed in an area of existing concentrations of low-income housing. Therefore the development of affordable housing in RDAs and URAs can reinforce, and increase, the spatial concentration of low-income housing.

Figure 11
Location of Section 8 Voucher Holders, 2011



Most cities have RDAs but not many have used them to produce affordable low-income housing. The one striking exception is Salt Lake City where the RDA has participated in nearly forty housing developments using funds generated by RDA projects.

Table 16
Selected Characteristics of RDAs, URAs, and EDAs in Salt Lake County, 2010

City/Project Area	Base Year	Yr. Housing \$ Available	Date Expires	Total Projected Tax Increment	Total Projected Housing Increment	Total Housing TIF Received to Date	Total Housing TIF Spent to Date	Back Loaded	Type
Bluffdale									
Gateway	1999		2015	\$12,500,000	\$1,135,998	\$0	\$0	yes	RDA
East Bluffdale	1998		2014	\$1,300,000	\$264,960	\$77,000	\$0	yes	EDA
Jordan Narrows	1999		2015	\$1,324,800	Inactive	\$0	\$0	yes	EDA
Draper									
East Bangerter	1991	2008	2015	\$13,977,132	\$2,795,426	\$0	\$0	yes	EDA
Holladay						\$273,000	\$0		
Village Center	2005	2008	2023		\$4,692,248	\$0	\$0	no	RDA
Olympus	2004	2006	2020		\$2,380,951	\$273,000	\$0	no	EDA
Cottonwood Mall	2007	2010	2025	\$126,441,476	\$19,266,221	\$0	\$0	no	URA
Midvale									
Brigham Junction	2003	2010		\$63,600,000	\$7,600,000	\$0	\$0	no	RDA
Jordan Bluffs	2003					\$0	\$0	no	RDA
Murray									
Smelter Site	1999	2002	2016	\$11,258,630	\$2,251,726	\$0	\$0	no	RDA
Fireclay	2004	2008	2030	\$530,741	\$106,148	\$0	\$0	no	RDA
Riverton									
13400 So. Bangerter	1998		2022	Closed		\$0	\$0	no	EDA
Sandy						\$600,000			
So. Towne Ridge	2002	2006	2020	\$6,675,000	\$1,335,000	\$600,000	\$20,000	no	EDA
Salt Lake City									
Central Business	1981	2007	2040		10% voluntary				RDA
Sugarhouse	1985	2007	2014		10% voluntary				RDA
W. Temple Gateway	1996		2018		10% voluntary				RDA
W. Capitol Hill	1996	1998	2018	\$5,270,000	\$1,317,500	\$456,801	\$456,801	no	RDA
Depot District	1998	2000	2022	\$166,666,667	\$25,000,000	\$4,676,429	\$4,676,429	no	RDA
Granary District	1998	1999	2022	\$66,666,667	\$10,000,000	\$42,230	\$42,230	no	RDA
Salt Lake County									
Cottonwood	*					\$2,400,000	\$200,000		EDA
West Millcreek	2008	2012	2031	\$27,223,170	\$4,452,847	\$0	\$0	no	EDA
Arbor Park/Magna	2008	2016	2023	\$4,971,900	\$994,400	\$0	\$0	yes	URA
South Jordan						\$900,000			
South Gate	1998	2007	2013	\$18,633,098	\$4,480,797		\$0	yes	EDA
S. Jordan Parkway	1999	2012	2015	\$5,973,627	\$1,570,131	\$0	\$0	yes	EDA
S. I-15 Frontage Rd.	1999	2019	2022	\$20,380,940	\$3,815,728	\$0	\$0	yes	RDA
N. Jordan Gateway	2000	2012	2015	\$17,723,088	\$4,155,712	\$0	\$0	yes	EDA

City/Project Area (Continued)	Base Year	Yr. Housing \$ Available	Date Expires	Total Projected Tax Increment	Total Projected Housing Increment	Total Housing TIF Received to Date	Total Housing TIF Spent to Date	Back Loaded	Type
S.J. Towne Center	2002	2005	2018	\$8,355,156	\$946,039		\$0	no	RDA
S.J. The District	2003	2006	2020	\$21,619,317	\$4,323,863		\$0	no	RDA
Merit Medical	2005	2007	2020	\$19,485,197	\$3,893,197		\$0	no	EDA
South Salt Lake									
3300 South Market Station	na			\$2,783,511	\$556,702				RDA
Upper Millcreek	2007	2010	2025	\$55,621,777	\$8,343,090	\$0	\$0	no	
300 East-Park Creek	na				\$1,117,625	\$229,520		no	URA
	na				\$946,112	\$107,108		no	
Taylorsville									
5400 South Bangerter	2007		2023	\$17,132,000	\$3,426,400	\$0	\$0	no	URA
West Jordan						\$1,135,983			
Town Center	1989	2000	2032				\$160,000	yes	RDA
Industrial Park	1990	2001	2033					yes	RDA
Southwire	1990	2002						yes	RDA
Spratling	1992	2001	2024					yes	RDA
Downtown	1993	2002	2025					yes	RDA
Briarwood	2003	2006	2018	\$21,854,005	\$2,819,830			no	RDA
West Valley City									
West Gateway	2001	2015	2019	\$16,111,325	\$4,288,822	\$40,987		yes	RDA
City Center	2003	2010	2024	\$22,310,075	\$4,537,088	\$0		yes	EDA
Jordan River	1999	2004	2019	\$16,402,749	\$2,568,852	\$208,683		no	RDA
Southwest	2007		2023	\$80,586,813	\$13,699,758	\$0			EDA
North Central	2007		2023	\$46,460,598	\$9,292,120	\$0			EDA

Source: Urban Renewal/Economic Development Study, Bonneville Research, 2010.

Siting of Residential Care Facilities – Residential care facilities provide housing for an important share of the disabled population. Care facilities are categorized as assisted living one (AL1) and assisted living two (AL2) facilities. AL1 provides assistance for residents needing minimal help with no more than two activities of daily living (ADL), whereas AL2 facilities provide care for those needing assistance with most or all ADL. Care facilities tend to be concentrated on the east side of the county, particularly in the Millcreek neighborhood of unincorporated Salt Lake County *Figure 12* and *Tables 17-18*. There are eleven care facilities in Millcreek with 522 beds, which accounts for nearly one-in-four of the care facilities beds in the county. On the west side, Taylorsville and South Jordan are the only cities with a sizeable number of available beds. Taylorsville has three facilities with a total of 259 beds and South Jordan has five facilities with a total of 230 beds. In two of the county’s major cities, West Valley City and West Jordan, there are few residential care facilities for disabled.

The spatial distribution of care facilities shows that developers and owners of residential care facilities generally prefer locations that have above average incomes and housing values. The spatial distribution doesn’t seem to be determined by zoning ordinances but rather corporate location policy. Consequently the opportunities for the disabled to live in care facilities in west Salt Lake City, West Valley City, Kearns, Magna, and West Jordan are limited.

Table 17
Assisted Living Facilities in Salt Lake County as A Percentage of
the County Total, 2013

Place	Number of Facilities	Number of Beds	Share of County Total
Draper	5	136	5.8%
Holladay	3	172	7.4%
Magna	2	21	0.9%
Midvale	1	126	5.4%
Millcreek	11	522	22.4%
Riverton	1	16	0.7%
Salt Lake City	5	326	14.0%
Sandy	12	409	17.5%
South Jordan	5	230	9.9%
Taylorsville	3	259	11.1%
West Jordan	3	55	2.4%
West Valley City	1	62	2.7%
Salt Lake County	52	2,334	100.0%

Source: Utah Department of Health Bureau of Health Facility Licensing

Other Zoning Characteristics – A survey of zoning ordinances and procedures was completed of the planning offices of the county and each of the entitlement cities. City comparisons are difficult due to nuances, exceptions, and conditional uses allowed. Nevertheless, in general the county and entitlement cities have diversity of residential densities accommodating various type of development from low density single-family to high density mixed use and TODs. Group homes, an important housing type for HUD, are allowed in all entitlement cities and the county. Only Salt Lake City has inclusionary zoning and is also the only city to provide incentives for affordable housing development. Only Sandy City allows accessory units in existing residential zones and none of the cities use zoning to augment the International Building Code requirements for the disabled.

**Table 18
Assisted Living Facilities in Salt Lake County, 2013**

Place	Type	Number of Facilities	Number of Beds
Draper	Total	5	136
	AL1	2	26
	AL2	3	110
Holladay	Total	3	172
	AL1	1	15
	AL2	2	157
Magna	Total	2	21
	AL1	2	21
	AL2	0	0
Midvale	Total	1	126
	AL1	0	0
	AL2	1	126
Millcreek	Total	11	522
	AL1	7	311
	AL2	4	211
Riverton	Total	1	16
	AL1	0	0
	AL2	1	16
Salt Lake City	Total	5	326
	AL1	2	97
	AL2	3	229
Sandy	Total	12	409
	AL1	6	44
	AL2	6	365
South Jordan	Total	5	230
	AL1	2	12
	AL2	3	218
Taylorsville	Total	3	259
	AL1	1	112
	AL2	2	147
West Jordan	Total	3	55
	AL1	2	23
	AL2	1	32
West Valley City	Total	1	62
	AL1	0	0
	AL2	1	62

Source: Utah Department of Health Bureau of Health Facility Licensing

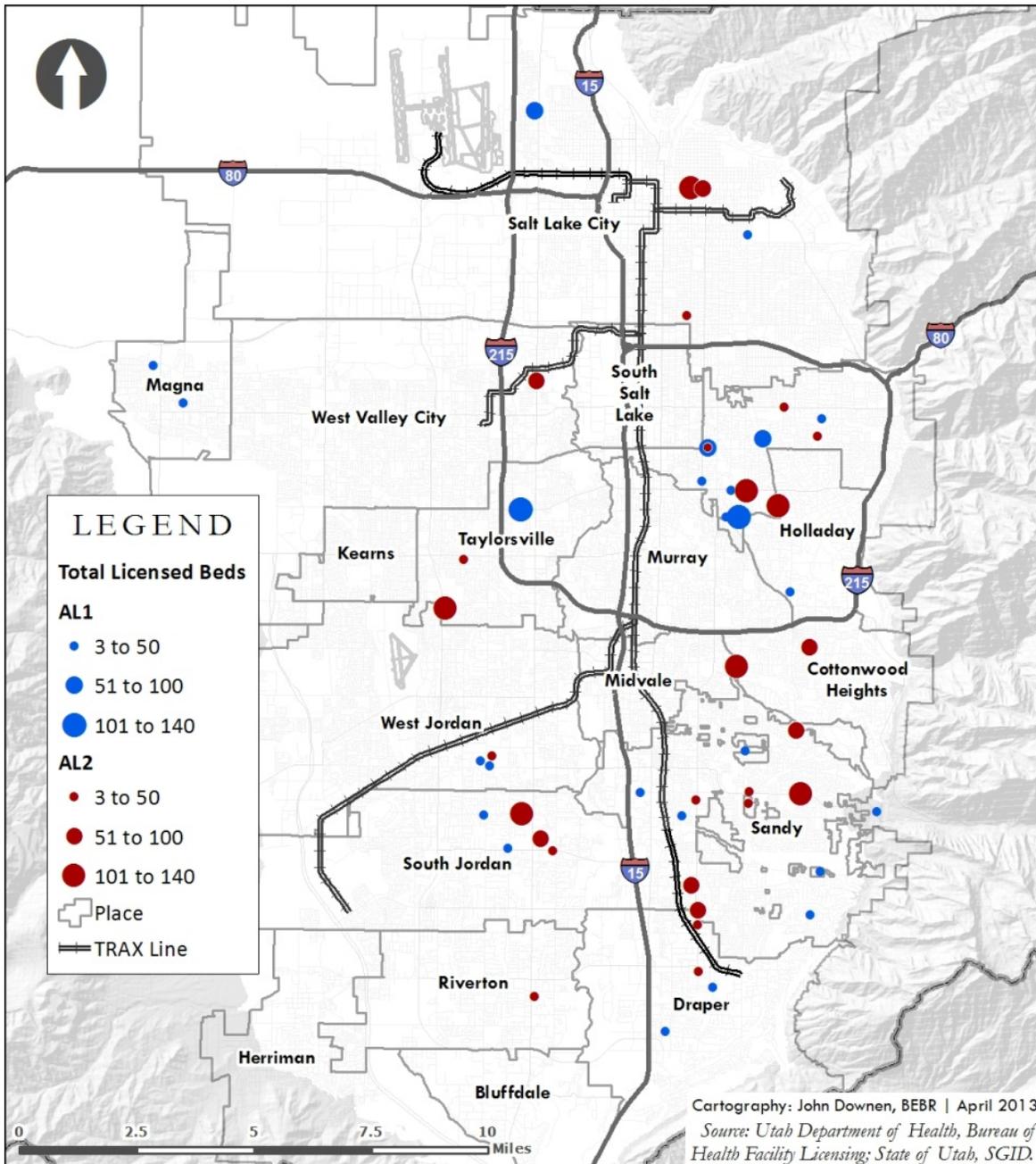
Owner occupied accessibility was suggested by Assist (local nonprofit). Assist recommended that city's adopt measures in TOD or mixed-use zones to require the Fair Housing Act's seven requirements of accessibility for owner occupied high density TOD units.

Inclusionary zoning would be particularly beneficial in the southwest communities of Herriman, Bluffdale, Riverton, and South Jordan to ensure that in these rapidly growing areas of the county protected classes will have housing opportunities, which will mitigate potential increased segregation in Salt Lake City and West Valley City.

Incentive zoning for affordable housing enables local governments to provide density bonus incentives to developers, in exchange for specific benefits and amenities. "When used to stimulate affordable housing, incentive zoning is similar to voluntary inclusionary policy. However, incentive zoning can also be used to stimulate a broad range of other outcomes, including the creation of walkways, parks and other open space, the inclusion of street-level retail in new development, and the creation of new child care facilities. Generally voluntary in nature, incentive zoning also applies

to a wider range of building types (residential, commercial, office, etc.) than inclusionary zoning. By combining incentives for affordable housing with incentives for building higher density housing near public transit and preserved open space, incentive zoning can also address a broad agenda that aims to reduce energy usage and emissions of greenhouse gases and promote smart growth land use patterns.” (*HousingPolicy.org*)

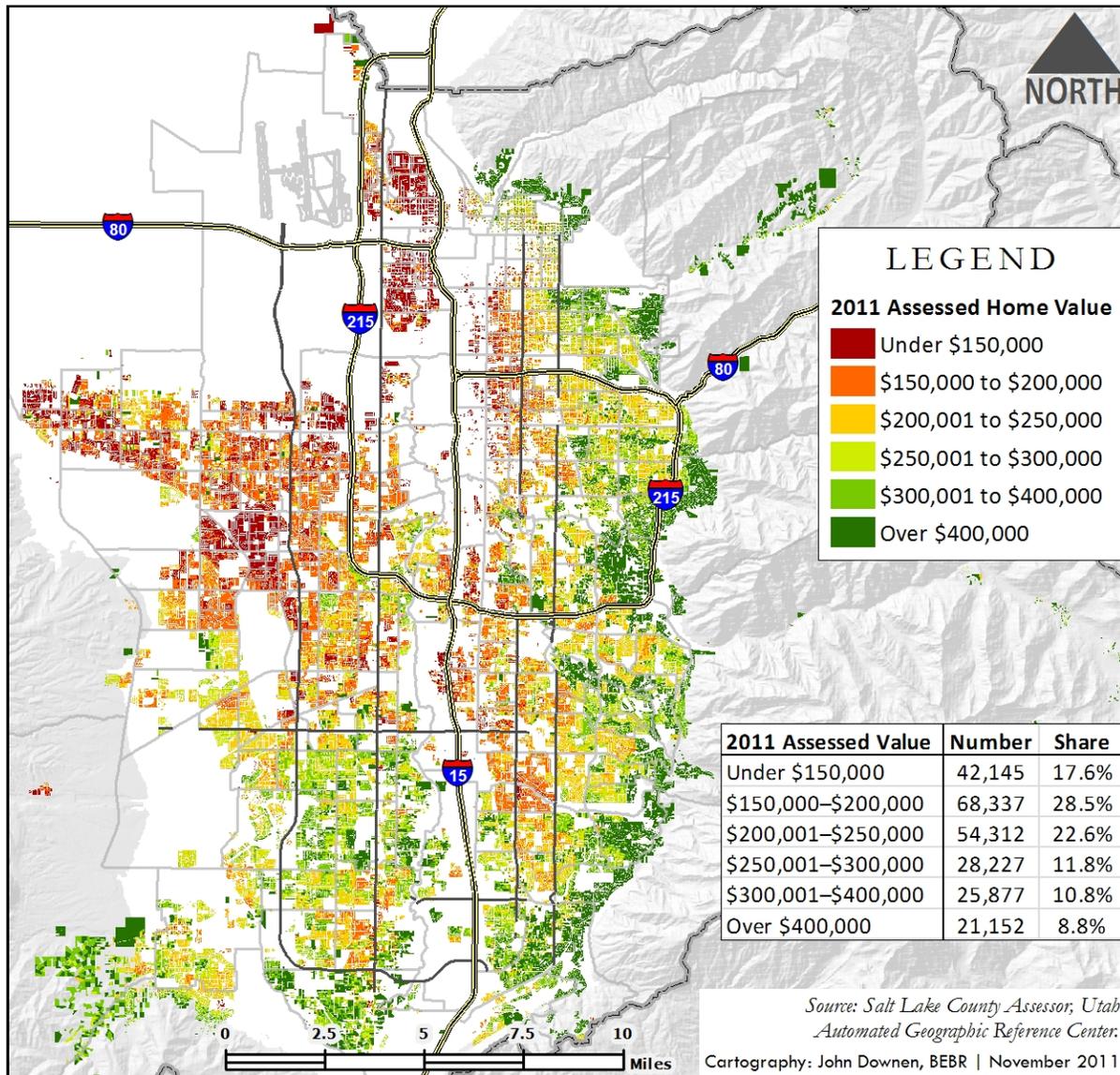
Figure 12
Location of Residential Care Facilities



Accessory units can be an important source of low-cost rental housing for small households in many communities. They can provide an opportunity for renters to enjoy the advantages of living

in established homeownership communities, including good schools and safe and quiet neighborhoods. Accessory units also provide opportunities for seniors to live close to family. Accessory units increase density, putting more people where infrastructure already is, thus lowering infrastructure costs. Accessory units can also allow people who have lost their homes to foreclosure to stay in their community as an ADU renter.

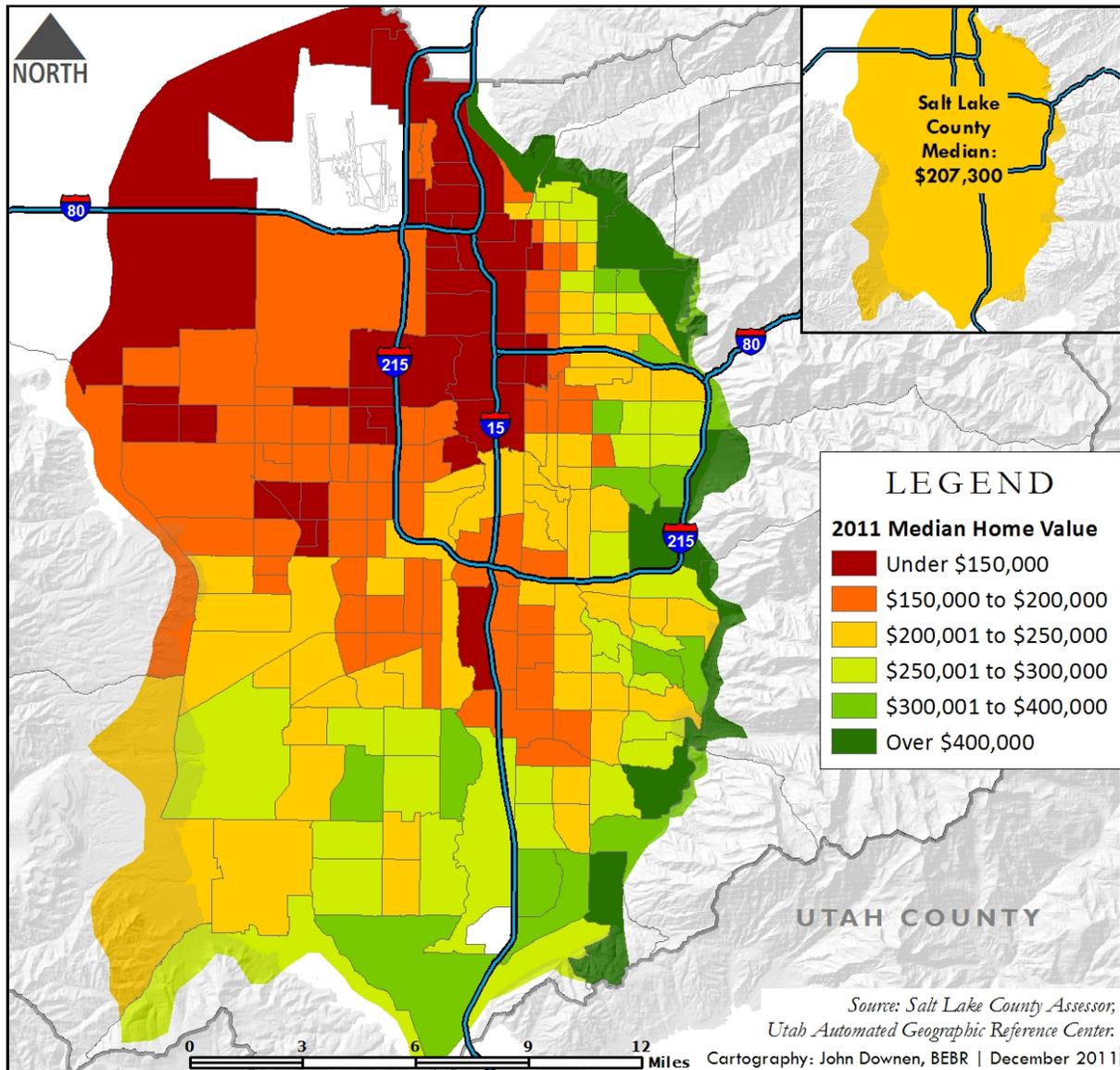
Figure 13
Value of Single-Family Homes in Salt Lake County, 2011
 (Parcel Data)



Siting and Housing Prices - Not only are Section 8 Voucher holders and renters of subsidized units generally limited to housing choices in Salt Lake City, South Salt Lake and West Valley City but, low-income homeowners are limited to these area as well. Homes that are valued at \$150,000 are affordable to moderate (80% AMI) and very low-income (50% AMI) households. Homes at these values are shown in red in *Figures 13-14*. The familiar pattern of settlement is present again; an

arc from west side Salt Lake City, through South Salt Lake, and west through West Valley City. Zoning and land cost relegate affordable housing to this portion of Salt Lake County.

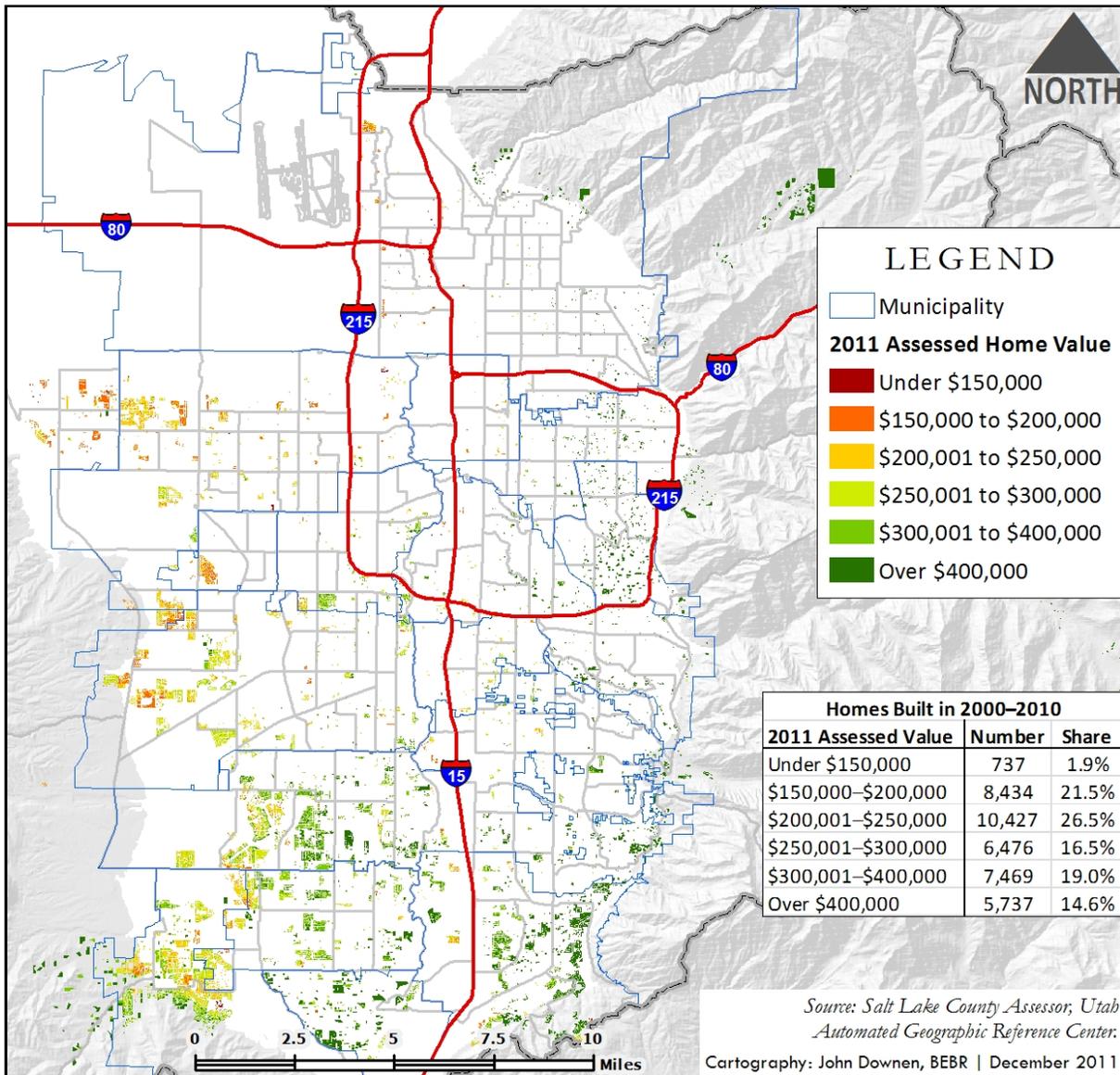
Figure 14
Median Value of Homes by Census Tract



New Home Development: Impediments and Opportunities - Homeownership opportunities for low and very low-income households expanded in the 2008-2011 period as housing prices in Salt Lake County have fell by 25 percent. *Figure 15* shows the value of new homes built since 2000. Fifty percent of all new detached single-family homes built in Salt Lake County between 2000 and 2010 were valued at less than \$250,000. At the low interest rates of 2010 a household at 80 percent AMI (Area Median Income) could qualify for a \$250,000 home, provided their credit history was “clean.” Nearly one quarter of all new homes were valued under \$200,000. Affordable new homes however, were almost entirely confined to the extreme west side of Salt Lake County, limiting affordable

housing choice. Since 2011 housing prices in Salt Lake County have recovered to the pre-recession levels and affordability has declined.

Figure 15
Assessed Value of New Single-Family Homes Built From 2000-2010



In several census tracts east of I-15 there has been considerable new home construction. Many tracts have had more than 15 percent of their single-family inventory added since 2000 but, few of these single-family homes have been affordable to median and low-income households *Figure 16*. Nevertheless, land availability will confine most of the new residential development in Salt Lake County to the extreme west side of Salt Lake County, and the southwest corner of the county, continuing the trend of the past 10 years *Figure 17*. Most of this developable land is in the jurisdictions of South Jordan, Herriman, Bluffdale, Riverton, and unincorporated Salt Lake County. To expand housing choice for protected classes, mitigate the trend toward segregation, and concentration of minorities and ethnicities, the housing plans and general plans of these jurisdictions

should provide for affordable rental and homeownership opportunities, which in turn will improve fair housing choice for protected classes.

Figure 16
New Single-Family Homes as Share of Total Homes in Census Tract
(Homes Built Since 2000)

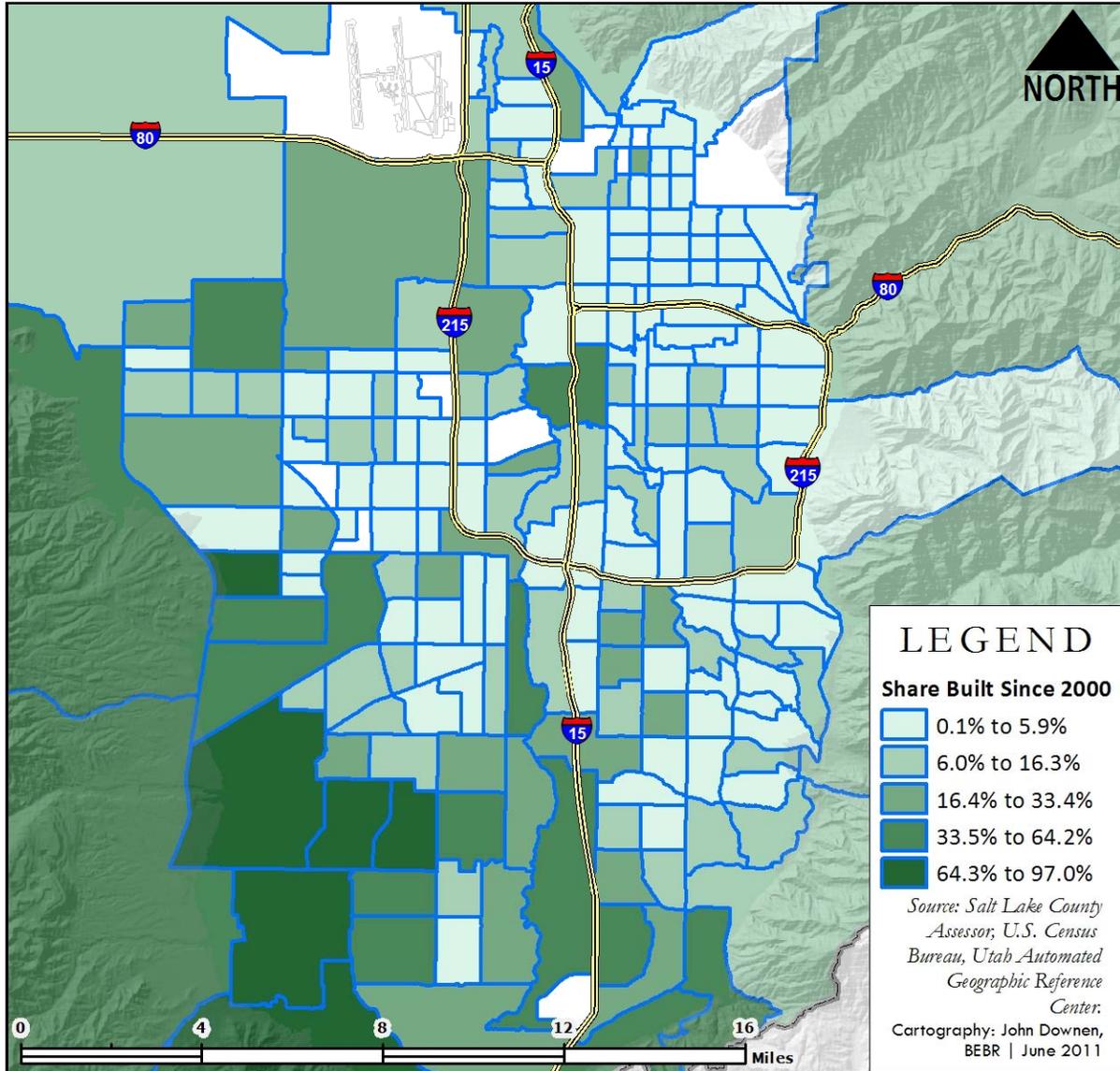
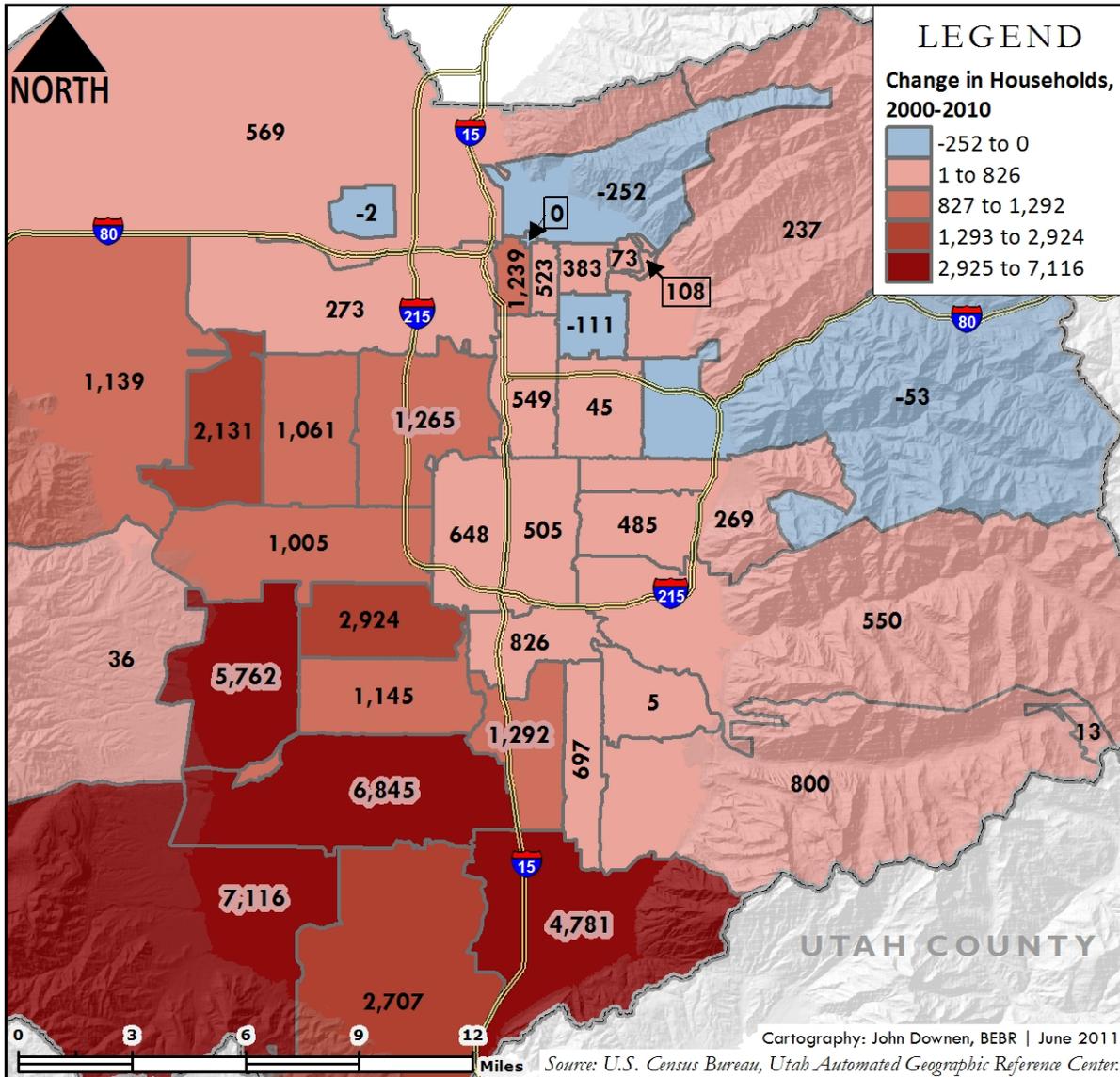


Figure 17
Change in Households by Zip Code



Policies and Practices of Public Housing Authorities

Twenty-five percent of the households in Salt Lake County have incomes below 50 percent of the AMI. Many of these eighty thousand low-income households never transition out of their low-income status. Consequently, they are perpetually in housing crisis; faced with severe housing cost burdens, overcrowding, and substandard or deteriorating housing. For some of these households the policies and practices of local Public Housing Authorities (PHAs) are decisive in facilitating affordable housing opportunity. To this end the principal tools used by Public Housing Authorities are Section 8 Vouchers and development of affordable units for families and seniors.

There are three public housing authorities in Salt Lake County; the Housing Authority of the County of Salt Lake, Housing Authority of Salt Lake City, and West Valley Housing Authority. These three

PHAs administer 5,824 vouchers in various programs; Section 8, Shelter + Care, HOPWA, refugees, etc. *Table 19*. Waiting lists are four to five years long. Two have closed applications due to the length of the wait list. The Salt Lake County and Salt Lake City housing authorities also own 945 public housing units. Public housing has shorter wait list of one to two years. Only one of the housing authorities uses preference. The preference is for victims of domestic violence

Local housing authorities have been instrumental in recent years in providing permanent supportive housing for the chronically homeless population. There are several recently developed projects targeted for the homeless, extremely low-income, and special needs households. The following projects have been completed in the past six years; Sunrise Metro (homeless 100 units), Kelly Benson (54 units seniors), Grace Mary Manor (84 units), and Palmer Court (201 units) administered by the Road Home. In addition there is a 72 unit project developed by the Housing Authority of Salt Lake City for homeless veterans on the VA campus and a 48 unit Karen Huntsman crisis center for victims of domestic violence on the YWCA site.

Table 19
Housing Vouchers by Housing Authority, 2012

	Housing Authority of Salt Lake City	Housing Authority Of the County of Salt Lake	West Valley City
<i>Housing Vouchers</i>			
Section 8 Vouchers	2,325	2,309	531
Enrollment	Closed	Open	Closed
Wait List Status	5 yrs.	4.2 yrs	4 yrs.
Shelter+Care Vouchers	81	188	40
Refugees Vouchers		136	
HOPWA Vouchers		17	8
Criminal Justice Vouchers		23	
County TBRA Vouchers		29	
State TBRA Vouchers		8	
HARP Vouchers		129	
<i>Housing Units</i>			
Public Housing Units	319	626 Units	None
Enrollment	Open	Open	Closed
Wait List Status	6-9 months	2.6 yrs Family, 1 year Senior	Closed

*TBRA = tenant based rental assistance, HARP = Home Affordable Refinance Program.

Source: Survey of housing authorities by Bureau of Economic and Business Research, University of Utah.

The demographics of voucher holders show that households with a disabled individual comprise a significant share of voucher holders *Tables 20-21*. Forty-five percent of the vouchers administered by the Housing Authority of the County of Salt Lake are households with a disabled individual. Similarly households with a disabled individual have a 46 percent share of the vouchers of the Housing Authority of Salt Lake City. The exception is the Housing Authority of West Valley City where only 18 percent of the voucher holders are disabled. Nevertheless, disabled individuals are well served by the voucher program given that only 8 percent of the population is disabled.

Vouchers held by minority households range from 36 percent for the county housing authority to 25 percent for the Salt Lake City housing authority to only 18 percent for West Valley City housing authority. Minority households have a disproportionately low share of vouchers in West Valley City,

given that 46 percent of the population in the city is minority. The low share of minority representation may be an impediment to the protected class of minorities since it does not seem to be offset by a large share of vouchers for disabled individuals, another protected class. The prevailing characteristics of voucher holders of the Housing Authority of West Valley City are: white single-parent and white senior households.

Table 20
Demographics of Voucher Holders by Housing Authority, 2012

	Housing Authority of the County of Salt Lake	Housing Authority of Salt Lake City	West Valley City Housing Authority
Total Vouchers	2,566	2,597	618
Race			
White	1,906	1,659	504
Black	190	431	18
Asian	37	65	3
Pacific Islander	10	23	13
Native American	60	46	0
Ethnicity			
Hispanic	363	373	80
Seniors	332	568	172
Disabled	1,142	1,191	115
Family Size			
Five Persons or More	275	382	9
Household Type			
Single mother w/children	na	615	396
Single father w/children	na	24	116

Source: Survey of housing authorities by Bureau of Economic and Business Research, University of Utah.

Table 21
Percent Share of Voucher Holders by Demographic Characteristics, 2012

	Housing Authority of the County of Salt Lake	Housing Authority of Salt Lake City	West Valley City Housing Authority
Race			
White	74.3%	63.9%	81.6%
Black	7.4%	16.6%	2.9%
Asian	1.4%	2.5%	0.5%
Pacific Islander	0.4%	0.9%	2.1%
Native American	2.3%	1.8%	0.0%
Ethnicity			
Hispanic	14.1%	14.4%	12.9%
Minority	25.7%	36.1%	18.4%
Seniors	12.9%	21.9%	27.8%
Disabled	44.5%	45.9%	18.6%
Family Size			
Five Persons or More	10.7%	14.7%	1.5%
Household Type	0.0%	0.0%	0.0%
Single mother w/children		23.7%	64.1%
Single father w/children		0.9%	18.8%

Source: Survey of housing authorities by Bureau of Economic and Business Research, University of Utah

Fair Housing Infrastructure

All entitlement jurisdictions should have well-structured and coordinated fair housing efforts (website, brochures, English and Spanish) that can be adopted as part of a regional fair housing outreach program. This outreach program should aim to mitigate fair housing barriers and raise awareness of fair housing issues in the region. Education, outreach, and enforcement are currently undertaken on a city by city basis with differing approaches. Some have a process for adjudicating complaints, others refer complaints to the state or HUD offices. Coordination should include nonprofits such as the Disability Law Center and Utah Legal Services. Cities should also have a language access plan and language interpreters on request.

Sandy City - The city of Sandy does not currently have a formal complaint process for residents who feel discriminated against as a protected class. As it stands now, if a call were to come into the city regarding a fair housing complaint by a resident, it would be filtered down to the Community Development Block Grant Program Manager (CDBG). Since there is no complaint process currently in place in Sandy, the CDBG Manager would most likely refer to Salt Lake County and the Utah Antidiscrimination and Labor Commission on how to proceed. Both of these organizations are staffed and have a system in place to address these complaints. Most likely due to a lack of a process, the city is unaware of any complaints that have been brought to the city. There currently is no formal process but Sandy's recently adopted general plan in January 2013 does include a goal to provide a range of housing opportunities for all residents, including those with special needs, and to eliminate discrimination in housing availability. Specifically, Goal 5.2.2 is to establish a system to handle any complaints from residents regarding violations of fair housing or provide for special needs populations. In the near future, it is the desire of the city's CDBG Program Manager to have a formal complaint system in place with online, phone, or in-person options available both in English and Spanish. Options for other languages would be made available upon request. Overall, the current lack of a fair housing discrimination complaint system is noted as a weaker area of the city of Sandy, and is a critical goal to be addressed.

Salt Lake City - Salt Lake City has no formal housing discrimination complaint process handled by the city itself. Instead, the city recommends contacting the Utah Antidiscrimination & Labor Division (UALD) of the Utah Labor Commission, which directly handles fair housing and discrimination claims over the entire state of Utah. The Utah Antidiscrimination and Labor Division is a state agency that works directly with tenants and landlords on housing discrimination cases. Any complaints that the city does receive, the city will pass along to the UALD and recommend to the filer to follow up with them, though it is rare they ever receive calls or complaints at the city. As a result, the city does not investigate cases of possible discrimination, nor do they make any conclusions or findings on cases. Typically, the city notes that the cases are resolved between the two parties, and rarely are cases brought to court.

To promote fair housing and the process of reporting to the UALD, Salt Lake City has a two-sided pamphlet handout—one side in English and the other in Spanish—that briefly describes fair housing and how to report discrimination. Similarly, the city helps facilitate training for sub-grantees and agencies who receive HUD money to help clients, specifically of the protected classes, to find fair and affordable housing.

Taylorsville - The city of Taylorsville has a department of Community Development that handles the topic of fair housing in the city. The website page is found on the city's official website¹, written only in English. On this web page, there is a link to a downloadable PDF with basic facts about the Fair Housing Act. This piece describes what is prohibited under law, the protection and definitions of protected classes, the rights of individuals and additional protections for persons with disabilities. In addition to the website, the city offers posters around the city offices regarding fair housing. All of the materials are written only in English. Taylorsville also participates in the Good Landlord Housing program and has a yearly action plan, updated each fiscal year.

Though the city has no formal complaint process in place, and complaints are traditionally directed to the Utah Antidiscrimination and Labor Division, residents are able to address complaints with the city. However, there is no material stating this is the case, and currently there is no formal complaint process, review, or plan of action for any cases reported to Taylorsville. The suggested method of contact is by email to a member of the Community Development office, specifically Dan Uttley. Yet, in the several years since the city has been incorporated they have not yet had a housing discrimination complaint filed in the city, and no cases in Taylorsville have been brought to UALD. In short, there is clearly no formal complaint process for housing discrimination in Taylorsville, but the city claims to be open to handling the process if it arises.

West Jordan - The city of West Jordan's website has information regarding fair housing and complaint contact information. The website, currently only written in English, will soon be translated into in Spanish. The contents of the website include prohibitions under fair housing regulations, information on protected classes, the types of housing covered, additional protections for disabled individuals, new building requirements, housing opportunities for families, and references to HUD for further fair housing information. On this webpage, there is also a link to more specific complaint information that describes the laws regarding housing and discrimination, giving a phone number for the Utah Antidiscrimination and Labor Division (UALD), with TDD and Spanish options. It also defines predatory lending practices, protected classes, family status, and source of income. There is also a link to another page with more specific information on senior housing in the city. Similarly, West Jordan participates in the Good Landlord program to help promote fair housing practices in the city.

Though there is not a formal complaint process in West Jordan, the city will welcome complaints from residents, mostly via the phone, but also through email. When this happens the complainant will be put into contact with the head of the Community Development Block Grant program who will then review the complaint to verify its merit as a fair housing complaint before passing it along to HUD or the UALD. This is done by speaking to the parties involved first, and the current CDBG coordinator has not had a single fair housing complaint in 13 years. Most complaints are instead landlord disputes not resulting from discrimination. To advertise fair housing in the city, West Jordan publishes an annual notice in the local newspaper promoting the law and initiatives of the city. However, this publication is currently just provided in English. Similarly, they have also instituted a fair housing awareness month in the city. If a complaint ever does come to the city, there are Spanish translators on staff. The city is also willing to seek out translator services as the need arises. Within the year, one such service, South Valley Sanctuary, is relocating to West Jordan's city hall, opening direct access to translator services in the same building.

¹ http://www.taylorsvilleut.gov/community_development.main.html

West Valley City - West Valley City Housing Authority is the main authority in the city regarding fair housing equity and law. The office is relatively small, consisting of five employees working in all aspects of fair housing from applications to inspections to grants. However, they do maintain a website² with a single page dedicated to fair housing law. Though this webpage appears to only be offered in English, there is a link at the bottom of the page which connects a user to Google Translator services to help facilitate navigation in other languages. This website provides a short overview of fair housing law, including the types of discrimination covered under the Civil Rights Act of 1966 and Title VIII of the Civil Rights Act of 1968, including race, color, religion, sex, national origin, handicap or familial status. It also includes a short list of warning signs for discrimination and provides an outlet for discrimination complaints stating: “Fair Housing Discrimination forms can be picked up at: West Valley Housing Authority, 4522 West 3500 South, West Valley City, UT 84120.” This is the only means of complaint processing that the West Valley Housing Authority provides. Of course, this provides great limitations to the complaint form process as the forms have to be picked up in person and there are no online or phone in options available. This limits the ability of residents to obtain these forms as this requires travel to the location during their operating hours of 7 a.m. to 6 p.m., Monday to Thursday. This may be inaccessible to many residents due to their inability to easily travel to the HA office, public transportation limitations in West Valley City, and inconvenient hours for parents and working adults who are likely to be busy during these hours.

Regardless of the accessibility of the housing discrimination forms, the West Valley City Housing Authority does not field any actual complaints against fair housing and equity. Instead, complaints are passed along to the UALD. The only times the housing authority deals directly with a complaint is when a resident feels discriminated against and is dissatisfied with the housing authority. This is reported to rarely happen, with a frequency of about once a year. In addition to the complaint form, the HA provides posters, pamphlets, and flyers as well as additional paperwork to all housing applications regarding fair housing law. Each of these materials is offered in both English and Spanish. They also provide orientations to all new applicants, refugees and residents involved with the West Valley City Housing Authority. Whenever these orientations are offered, the housing will set up a translator of other foreign languages as needed. Approximately twice a year, the HA offers training for landlords and owners, regarding fair housing policy and ordinances in the city. Likewise, the city participates in the Good Landlord Program which provides landlords with a discount on their business license for agreeing to the language and guidelines of the program. The West Valley Housing authority has no plans to further expand their fair housing advertisement, complaint process, or implement a city-specific fair housing complaint process in the future.

Landlord Tenant Rights - Local nonprofits cite numerous instances of the imbalance between landlords and tenants. Utah law appears to heavily favor landlord rights. Community Action Program (CAP) recommended a law requiring landlords to provide rental contracts for all tenants. A contract would prevent 15 day no cause evictions which landlords use to arbitrarily evict tenants.

In recent years many cities have adopted the Good Landlord Program. In some cities their Good Landlord Program could result in discrimination and “disparate impact” of protected classes and borders on discriminatory actions which may face legal challenges.

The policies and practices of entitlement cities are described in *Table 22*.

² <http://www.wvc-ut.gov/index.aspx?NID=323>

**Table 22
Policies and Practices Affecting Fair Housing Choice**

	Salt Lake City	Sandy	Taylorsville	West Jordan	West Valley City
Comprehensive Housing Plan					
Fair Housing Law	City has Housing Nondiscrimination Ordinance Adopted in 2009. Protected classes expanded to include source of income and sexual orientation	State & Federal laws	State and Federal	State & Federal laws	Yes, Non-discrimination law that covers housing
Website for Fair Housing	Website and brochures. Extensive fair housing outreach. HAND, Diversity and Human Rights informs disabled of rights, workshops for CDBG, ESG, HOME and HOPWA on fair housing, Fair Housing Forum	No under consideration	Brochure	Yes	Yes, through the HA website
Housing Complaint Form	Complaints are referred to state.	No under consideration	No	Yes English and Sp.	Yes HA
Complaint Process	Under ordinance city provides respondent with written notice of complaint. 15 days to respondent. City begins investigation	Under consideration	Yes, complaints are referred to HUD	Discussed with CDBG office. Referred to HUD	No
How does city mitigate housing complaint	Conciliation process undertaken	Under consideration	Pass to HUD and state		Referred to state
Good Landlord Program	Yes. Model good landlord program. Crafted with help of Community Action Program	No under consideration	Yes 2010	Yes 2009	Yes. October 2006
Anti-Displacement Provision	Follows Title II and Title III of Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970	No under consideration	In manufacture home ordinance city will meet all State anti-displacement and relocation policies	Yes, CDBG and HOME funds	State relocation and displacement law

	Salt Lake City	Sandy	Taylorsville	West Jordan	West Valley City
Policy for Homeless	Yes. CDBG, ESG,HOME and HOPWA funds to provide assistance to local nonprofits to address homelessness	CDBG and goals	Allocates some CDBG money to Road Home	No, not separate from low and moderate income housing plan	No
AFFH policies in past two years	Comprehensive assistance including: The Road Home, YWCA, Odyssey House, Catholic Community Services, Valley Mental Health, Tenant Based Rental Assistance, CAP, emergency rent and deposit assistance, tenant landlord mediation, Utah AIDS Foundation	CDBG programs, HOME consortium, worked to provide emergency home repairs, home owner counseling. EDA money set aside has been utilized to help provide affordable rental housing	\$40,000 of HOME money to housing rehab, \$200,000 to ASSIST for rehab and \$47,000 for Life care funding for rehab. Also \$414,145 in HOME funds to help in construction of Taylorsville Senior Housing 202 project	CDBG,HOME & RDA	Through administration of CDBG, HOME,TBRA, HOPWA and shelter plus care

Source: Survey of cities by Bureau of Economic and Business Research, University of Utah.

Fair Housing Complaints – The Utah Antidiscrimination and Labor Division data on discrimination complaints also includes complaints made to HUD. Over the past five years 225 complaints in Salt Lake County have been filed *Table 23*. The basis of 30 percent of these complaints has been discrimination due to disability. Disability leads all categories in perceived reason or basis for the complaint, followed by family status at 25 percent, and race and ethnicity at 22 percent. These data raise concerns that discrimination is impeding fair housing choice for disabled individuals and large families.

Table 23
Housing Discrimination Complaints Filed to State of Utah and HUD
(Salt Lake County)

	Disability	Sex	Family Status	Race	Retaliation	Source of Income	Religion	Total
2007	14	2	18	5	6		0	45
2008	15	5	21	20	10	1	1	73
2009	12	2	2	16	5	2	4	43
2010	12	1	0	4	4	1	0	22
2011	14	2	16	5	5	0	0	42
Total	67	12	57	50	30	4	5	225
Share	29.78%	5.33%	25.33%	22.22%	13.33%	1.78%	2.22%	100.0%

Source: Antidiscrimination & Labor Division, State of Utah.

Salt Lake City’s Community Action Program (CAP) has been tracking barriers to housing under the Homeless Prevention & Rapid Re-housing Program. CAP is using federal money to fund rental and deposit assistance programs. As part of the program individuals are being surveyed regarding perceived barriers to housing. Disability ranks fourth in frequency of response as a cause of housing discrimination.

Table 24
Utah Legal Center Cased Calls: Characteristics of Callers with Housing Complaints
In Salt Lake County

	FY2011	% Share 2011
Total Cased	731	100.0%
Disabled	142	19.4%
Race		0.0%
Asian/Pacific Islander	7	1.0%
Black	46	6.3%
Hispanic	105	14.4%
Native American	15	2.1%
White	533	72.9%
Other/Unknown	25	3.4%
Age		0.0%
0-12	0	0.0%
13-17	0	0.0%
18-24	51	7.0%
25-59	510	69.8%
60+	170	23.3%
Unknown	0	0.0%
Sex		0.0%
Female	496	67.9%
Male	235	32.1%
Unknown	0	0.0%
Marital Status		0.0%
Single	303	41.5%
Married	138	18.9%
Separated	73	10.0%
Widowed	37	5.1%
Unknown	180	24.6%

Source: Utah Legal Center.

Utah Legal Services data show that in 19 percent of “Cased Calls” reports the basis of the complaint was disability. The race and ethnicity of individuals filing complaints are consistent with state demographic patterns. Seventy-one percent of those filing complaints were white and 14 percent were Hispanic. Data in *Tables 24-25* do not suggest, at least for those filing complaints, a significant level of discrimination based on race or ethnicity.

Table 25
Utah Legal Center Total Calls: Characteristics of Callers with Housing Complaints
in Salt Lake County

	FY2011	% Share 2011
Total Calls	1,561	99.4%
Age 60+	144	9.2%
Race		0.0%
Asian/Pacific Islander	29	1.8%
Black	69	4.4%
Hispanic	229	14.6%
Native American	21	1.3%
White	1,117	71.1%
Other/Unknown	96	6.1%
Over 125% Poverty OR Over in Assets	368	23.4%
Veteran=Yes		0.0%

Source: Utah Legal Center.

Finally, the Disability Law Center also fields calls regarding housing discrimination. Their data do not show the basis of the discrimination but does show that in the past fiscal year 229 individuals in Salt Lake County filed complaints regarding housing discrimination *Table 26*. Over 95 percent of the complaints were filed by non-Hispanic whites and slightly more than half were filed by women. The Disability Law Center is in the process of developing a comprehensive survey regarding housing, transportation, and employment. The housing section of the survey will ask three or four detailed questions regarding housing discrimination. The results should provide further insight into the level of housing discrimination based on disabilities.

Table 26
Housing Complaint Assistance by Disability Law Center, FY 2011
(Salt Lake County)

Type	Calls
Level of Service:	
Information and Referral	124
Short-Term Assistance	83
Representation at Meeting (s)	19
Representation at Hearing (s)	3
Total	229
Ethnicity:	
American Indian	2
Black (Not Hispanic/Latino Origin)	4
Hispanic Latino	9
White (Not Hispanic/Latino Origin)	211
Other/unknown	1
Refused	1
White (unknown)	1
Gender:	
Female	131
Male	98
Age:	
0-12	3
13-17	2
18-24	8
25-59	156
60+	26
Unknown	34

Source: Disability Law Center.

Note: Definition of Terms by DLC

Information and referral: a client was given basic information and a referral.

Short Term Assistance: a client was given at least one additional piece of information beyond a referral.

Representation at meeting(s): the DLC attended meetings and/or made calls with or on behalf of the client.

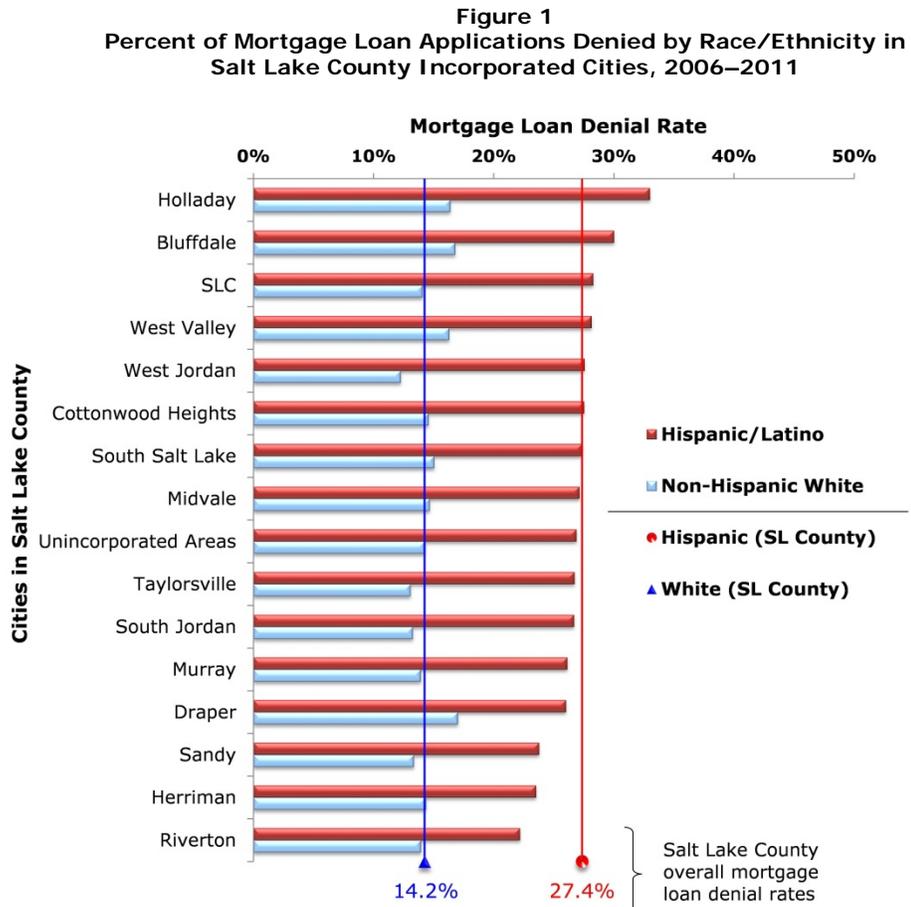
Representation at hearings: the DLC attended a hearing, in these cases a Utah Antidiscrimination and labor commission administrative hearing with and/or on behalf of the client.

SECTION II PRIVATE POLICIES AND PRACTICES: LENDING

The disparities in homeownership across racial and ethnic lines reflect only the symptoms of underlying impediments in the home mortgage application process. The Home Mortgage Disclosure Act (HMDA) data was compiled for Salt Lake County to better understand the barriers that members of the protected class face in obtaining mortgages. For illustrative purposes, non-Hispanic white applicants were compared with Hispanic/Latino applicants for most metrics derived from the HMDA data. Homeownership and housing stability are two dimensions of housing opportunity that can be assessed using HMDA data by examining mortgage application outcomes and the high-interest lending practices.

Figure 1 shows the overall mortgage denial rates from 2006 to 2011 by race and ethnicity for each city in Salt Lake County. The vertical reference lines in Figure 1 mark the overall county-level denial rates for non-Hispanic white and Hispanic/Latino applicants, which are 14.2 and 27.4 percent, respectively.

Holladay and Bluffdale have the highest Hispanic denial rates in the county, averaging over 30 percent. Note that the two cities account for only 0.6 percent of the total Salt Lake County mortgage applications for Hispanics. However, other cities with high mortgage application rates among Hispanics have similar denial rates. Salt Lake City and West Valley City, which account for 45 percent of the county's



Hispanic mortgage applications, have Hispanic denial rates slightly above the overall Hispanic denial rate at the county level. In other words, while the Hispanic denial rates in southern and eastern cities in the county might deviate from the overall Hispanic denial rate due to low Hispanic application volume, the Hispanic denial rates are significantly higher than those among non-Hispanic white applicants for all cities in Salt Lake County.

Figure 2
Percent of Mortgage Loan Applications (At or Below 80% HAMFI) Denied by Race/Ethnicity in Salt Lake County Incorporated Cities, 2006–2011

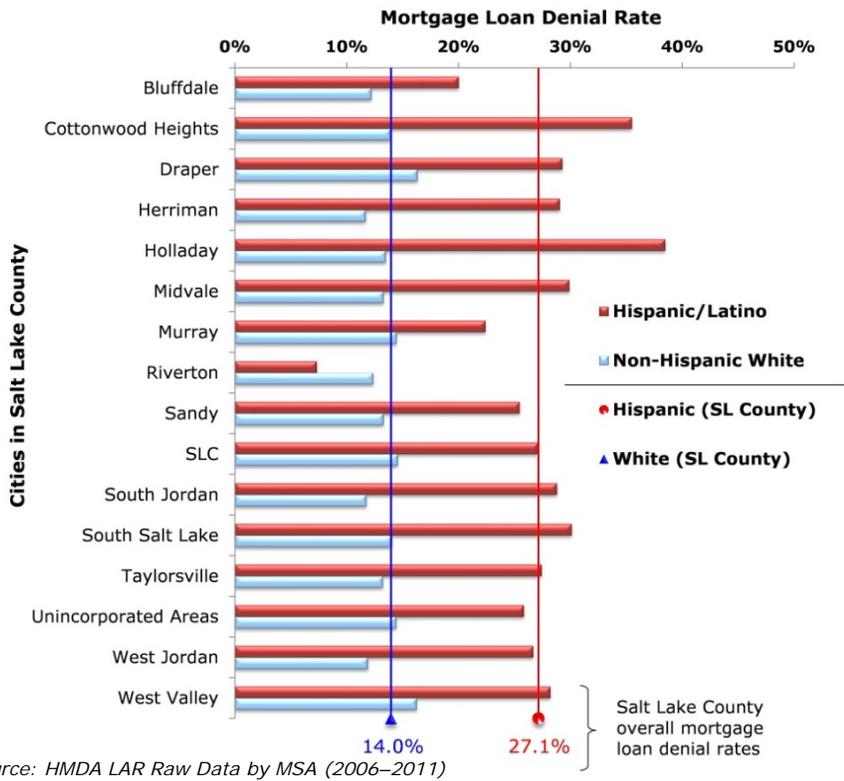
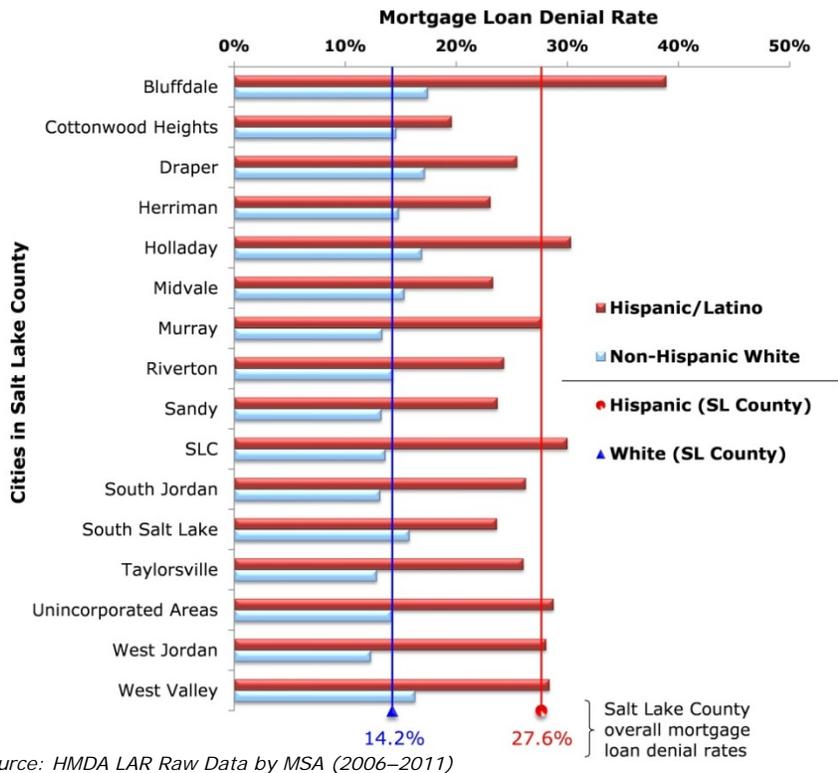


Figure 3
Percent of Mortgage Loan Applications (Above 80% HAMFI) Denied by Race/Ethnicity in Salt Lake County Incorporated Cities, 2006–2011

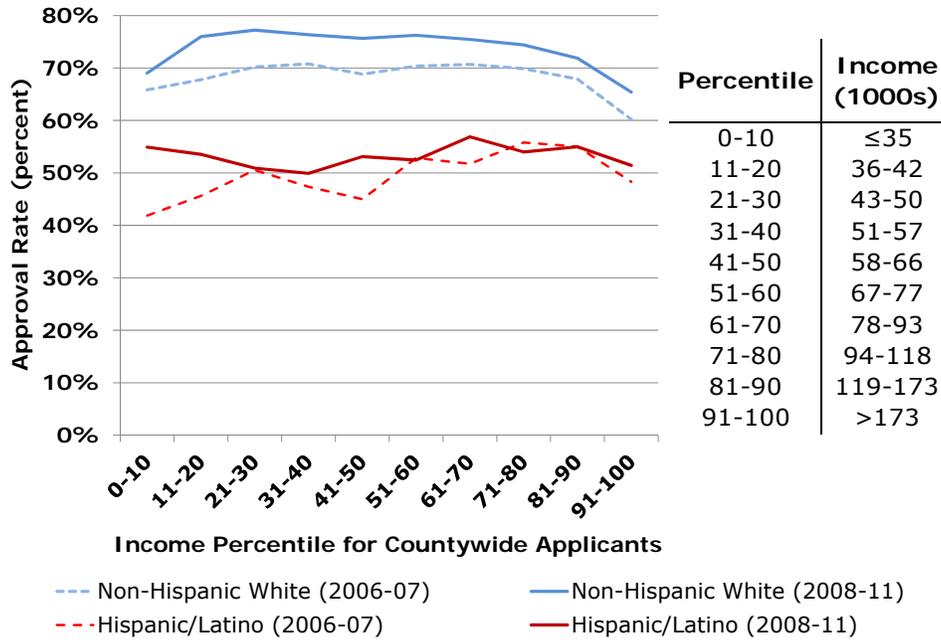


Despite the large gaps in denial rates between non-Hispanic white and Hispanic applicants shown in Figure 1, the inherent income differences between the two groups could be contributing factor to this gap. However, as shown in Figure 2 and Figure 3, even when the denial rates are disaggregated by different income categories, the denial rate gap between the two groups persists. Figure 2 shows the denial rates among white and Hispanic applicants with reported incomes at or below 80 percent HAMFI (median family income), while Figure 3 shows the denial rates for applicants with reported incomes above 80 percent HAMFI. Note that the reported incomes for applicants from 2006 to 2011 are adjusted relative to the median family income for the year that they filed their mortgage applications.

The overall county-level denial rates do not change across groups. The Hispanic denial rate remains at levels above 27 percent, while the white denial rate is 14 percent—regardless of income bracket. At the city level, the denial rate gap between the two groups closely resembles that of the county level. The only anomaly is Riverton, which has a lower Hispanic denial rate than that of non-Hispanic whites in the income category at or below 80 percent HAMFI *Figure 2*. However, note that Riverton had only 41 Hispanic applications during this 6-year period with reported incomes at or below 80 percent HAMFI. Furthermore, over a fifth of these applications were withdrawn from the applicant. This withdrawal rate is twice as high as the overall county level for Hispanic applicants in this income bracket. Riverton’s low Hispanic application volume and high application withdrawal rate could have contributed to the low Hispanic denial rate. Nonetheless, for applicants above the 80 percent HAMFI threshold, the denial rate gap in Riverton resurfaces.

While the denial gap is reduced from the low-income bracket *Figure 2* to the high-income bracket *Figure 3* for some cities, such as Cottonwood Heights, Bluffdale, and Draper the overall county denial gap does not change between these two income brackets. In the case of Cottonwood Heights, Bluffdale, and Draper, these three cities accounted for 10 percent for the county’s non-Hispanic white applications, but only 2.5 percent of the total Hispanic applications. On the other hand, the denial gap persisted across the two income brackets in Salt Lake City and West Valley City, which accounted for a quarter of the county’s white applications and 45 percent of the total Hispanic applications. Thus, smaller cities might have some variability in denial rate gaps due to smaller application volumes, but the overall denial gap persists regardless of income bracket.

Figure 4
Approval Rates by Income Level and Race/Ethnicity in
Salt Lake County, 2006–2011

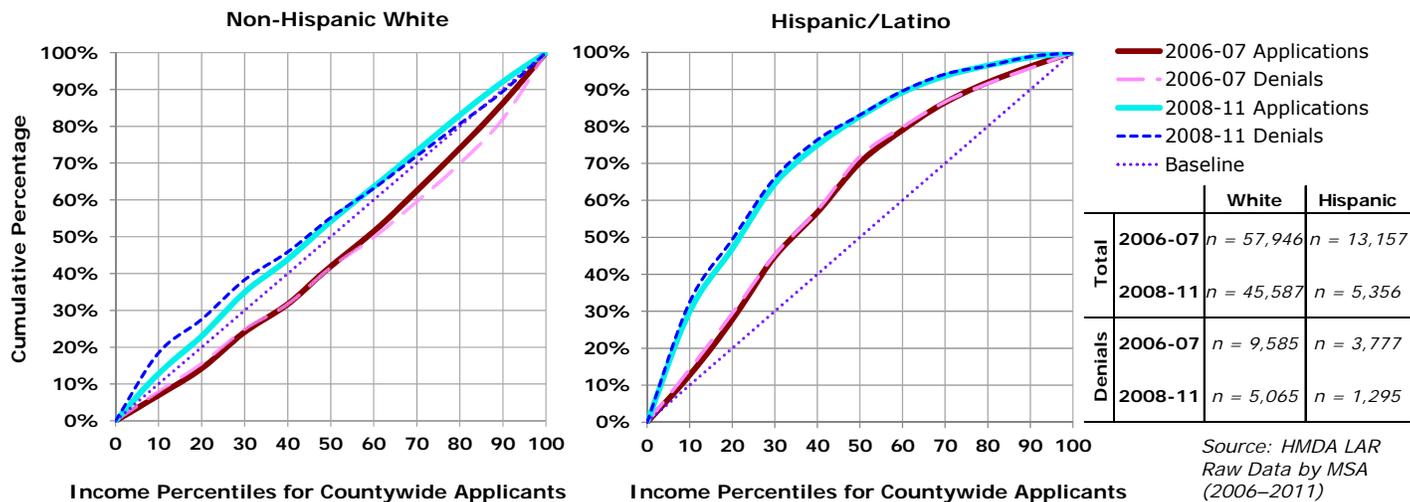


Source: HMDA LAR Raw Data by MSA (2006–2011)

Given the small application volume for several cities in Salt Lake County, the reported income was only disaggregated to two income brackets, using 80 percent HAMFI as the threshold. *Figure 4*, on the other hand, shows the overall county-level approval rates for both groups disaggregated by more income brackets to determine if the gap persists consistently at all income levels. The percentiles shown on the horizontal axis represent nominal dollars that are constant across both groups. The income levels are based on the income deciles of the total Salt Lake County applicants in the HMDA data from 2006 to 2011.

Interestingly, the non-Hispanic white approval rates have increased from the housing boom peak in 2006 and 2007 (dotted blue line in *Figure 4*) to the subsequent housing bust (solid blue line) for all income deciles. The Hispanic approval rates have not systematically increased during the transition of these two housing period, with the exception of those at the lowest two income deciles (below \$42,000/year). Nonetheless, across all income levels, the approval rate gap persists between the two groups. Non-Hispanic white applicants have approval rates near or above 70 percent for nearly all income levels, while Hispanic approval rates do not reach 60 percent—even for Hispanics at the highest income decile (greater than \$173,000/year).

Figure 5
Cumulative Distribution of Applications and Denials across Income Levels by Race/Ethnicity in Salt Lake County, 2006–2011



The income percentiles were determined from the all applicants with reported incomes in the Salt Lake County HMDA dataset from 2006-2011. Thus, the income percentiles represent constant income levels for both groups. Please refer to Figure 4 on page 58 for the corresponding income levels in nominal dollar amounts.

The disparities in application outcomes across racial and ethnic groups also need to be examined on the basis of income distributions. *Figure 5* shows the cumulative percentage of total applications and denials across income levels by race/ethnicity and housing periods. The purple dotted line is the baseline, meaning that curves that approach the shape of this baseline have distributions similar to the overall reported income distribution of all applications in Salt Lake County in the HMDA dataset from 2006 to 2011. Cumulative application distributions for a subpopulation above the baseline suggest that this group has more applicants in the lower income deciles compared to the entire 2006 to 2011 Salt Lake County HMDA dataset. Likewise, cumulative application distributions below the baseline mean that the group has more applicants in higher income deciles.

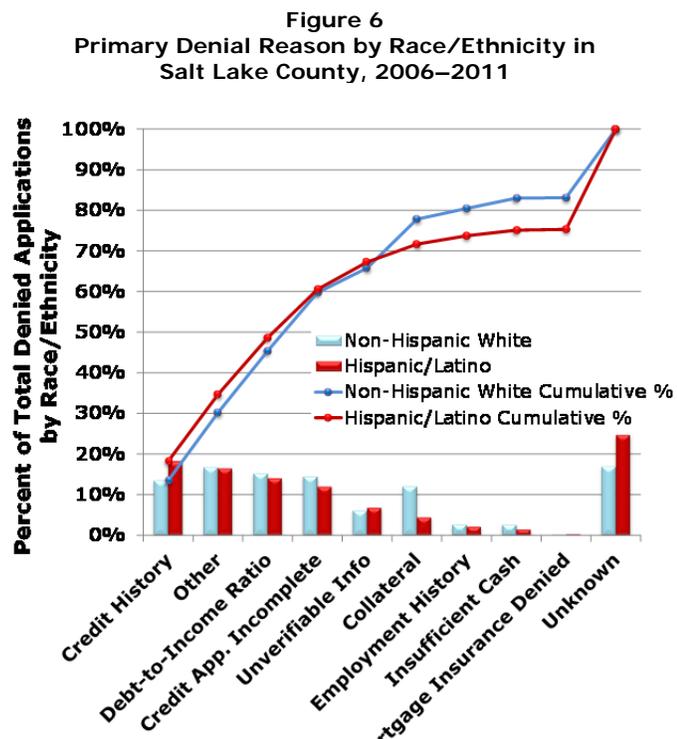
The two panels in *Figure 5* each overlay the cumulative application distributions (solid lines) with the corresponding cumulative denial distributions (dotted lines) for the two housing periods. For both non-Hispanic white and Hispanic/Latino applications, the distributions have skewed more to the lower income levels after the housing boom. Interestingly, the cumulative distributions of denials and total applications for Hispanics are nearly identical for both housing periods. This means that Hispanic applicants at the lowest income levels have not received a disproportionately high share of the total denied applications among Hispanics.

On the other hand, the cumulative denial distributions for non-Hispanic white applicants deviated slightly from the total cumulative application distributions. During the housing boom period, non-Hispanic white applicants at the highest income level (earning more than \$173,000/year) received a disproportionately higher share of denials than expected based on the total income distribution of the white applicant pool. This is depicted on the left panel in *Figure 5* at the point where the slope of the pink dotted line (cumulative denials) is steeper than the solid red line (cumulative applications) at the highest income decile. In fact, less than 14 percent of non-Hispanic whites are in the highest income decile but account for 18 percent of the total denials among non-Hispanic whites. Similarly,

during the housing bust period from 2008 to 2011, non-Hispanic white applicants at the lowest income levels accounted for a disproportionately higher share of denials than expected from the total white applicant income distribution. This is graphically shown on the left panel in *Figure 5* at the interval where the dotted blue line (cumulative denials) is more concave than the solid blue line (cumulative applications).

Since Hispanic applicants were not systematically denied applications on the basis of income, the large denial rate gaps between the two groups cannot be explained by the generally lower incomes among Hispanics. Other factors such as credit history could be the driving force behind the mortgage denials. Nonetheless, race and ethnicity could still be an explanatory factor for the existing approval and denial rate gaps.

Figure 6 shows the composition of denial reasons by race/ethnicity for all denied non-Hispanic white and Hispanic/Latino applicants from 2006 to 2011. While as many as three denial reasons may be reported, *Figure 6* shows only the primary reason for the sake of simplicity. The bar graph component of *Figure 6* shows the proportion of denied applications by race/ethnicity attributed to each denial reason. Note that 17 percent and 25 percent of the denials for white and Hispanic/Latino applicants, respectively, did not have a documented reason for denials. In fact, the reporting of denial reasons is not mandatory except for institutions under the supervision of the Office of the Comptroller of the Currency or the Office of Thrift Supervision³.

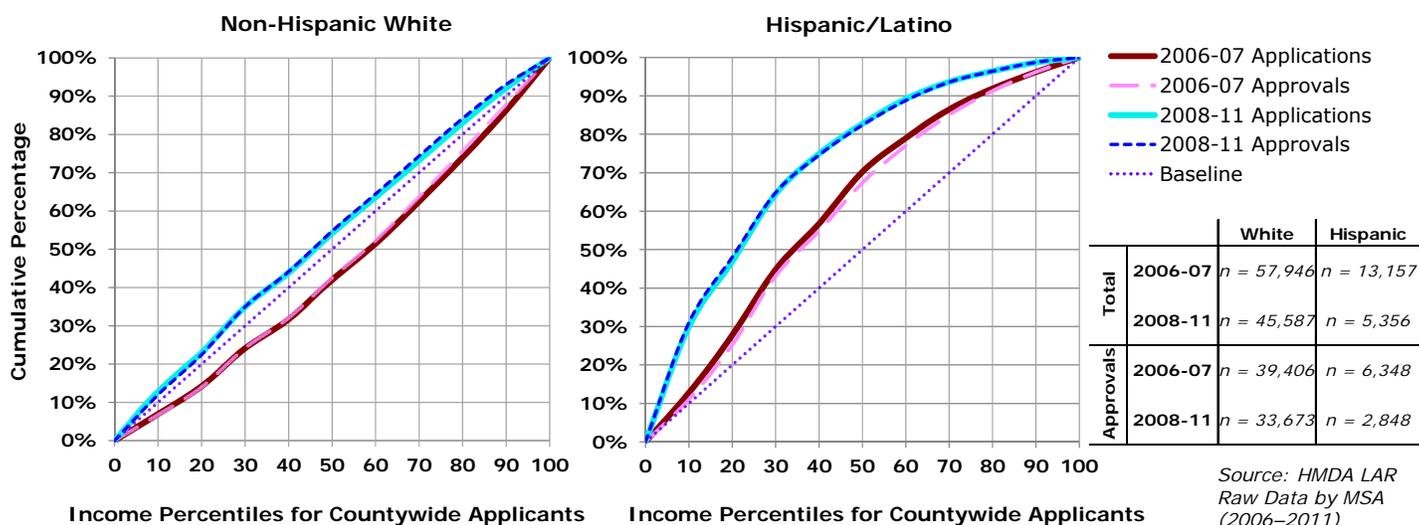


Source: HMDA LAR Raw Data by MSA (2006–2011)

The line graph component of *Figure 6* represents the cumulative percentages for the denial reasons listed from left to right. Over 40 percent of the denials among non-Hispanic white and Hispanic/Latino applicants are due high debt-to-income ratios, poor credit history, and incomplete credit applications. However, given the large share of denied applications with no documented reasons and the lack of detailed credit history information, the HMDA data cannot conclusively reveal the reasons behind the denied mortgage applications.

³ Federal Financial Institutions Examination Council. *HMDA Glossary*. 28 September 2011. 4 October 2012. <<http://www.ffiec.gov/hmda/glossary.htm>>.

Figure 7
Cumulative Distribution of Applications and Approvals by Income and Race/Ethnicity in Salt Lake County, 2006–2011



The income percentiles were determined from the all applicants with reported incomes in the Salt Lake County HMDA dataset from 2006-2011. Thus, the income percentiles represent constant income levels for both groups. Please refer to Figure 4 on page 58 for the corresponding income levels in nominal dollar amounts.

Figure 5 disproves the notion that the high Hispanic denial rates may have stemmed from lower-income Hispanic applicants receiving a disproportionately large share of denials. Similarly, Figure 7 shows that high-income applicants do not receive the bulk of all mortgage approvals. In fact, the cumulative income distributions for approved and total applications are fairly comparable for both non-Hispanic whites and Hispanics as shown in Figure 7. This means that approvals are not disproportionately concentrated among applicants in the higher income brackets. Thus, inherent income distribution differences between non-Hispanic white and Hispanic applicants cannot explain the reason for the approval rate gaps.

The index of dissimilarity, Table 1, measures the extent to which the income distributions of approved and denied applicants differed from the income distribution of total applicants. The indices are interpreted as the proportion of applicants that must move to another income decile in order to

Table 1
Indices of Dissimilarity for Denials & Approvals by Race/Ethnicity in Taylorsville, 2006–2011

	Denials		Approvals	
	Boom	Bust	Boom	Bust
Non-Hispanic White	0.06	0.08	0.02	0.02
Hispanic/Latino	0.03	0.03	0.04	0.02

Source: HMDA LAR Raw Data by MSA (2006-2011)

make the overall distribution and the approval/denial distributions identical. The **Index of Dissimilarity** section on page 68 has a detailed explanation of this metric.

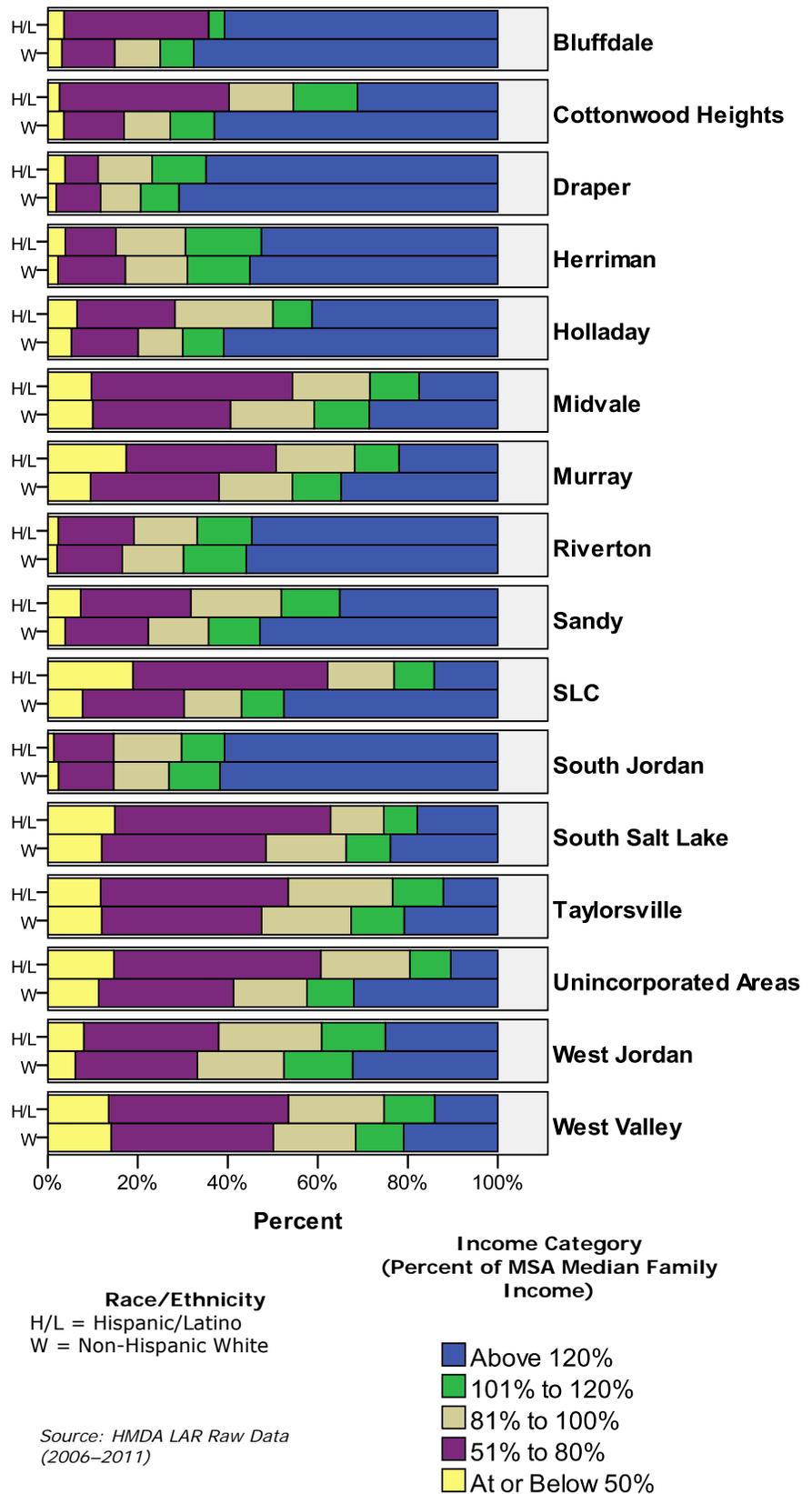
For both groups, the indices of dissimilarity for denials and approvals have not changed drastically across housing periods for both groups. The index of dissimilarity between denials and total applications are slightly higher for non-Hispanic whites. This means that slightly more non-Hispanic white applicants would have to move to other income brackets in order for the denial distribution to resemble that of the entire white applicant pool. Thus, neither the indices nor the graphical representations of

Figure 8
Applicant Income Distribution by Race/Ethnicity in
Salt Lake County Cities, 2006–2011

application outcomes by income distributions suggest that the low approval rates and high denial rates among Hispanic/Latino applicants are due to the income disparities across racial and ethnic groups alone.

Figure 8 shows the applicant income distribution by race and ethnicity for each city in Salt Lake County. The income categories are based on the reported incomes as a percentage of the MSA median family income. Each reported income has been adjusted as a percentage of the median family income for the year that the mortgage application was submitted.

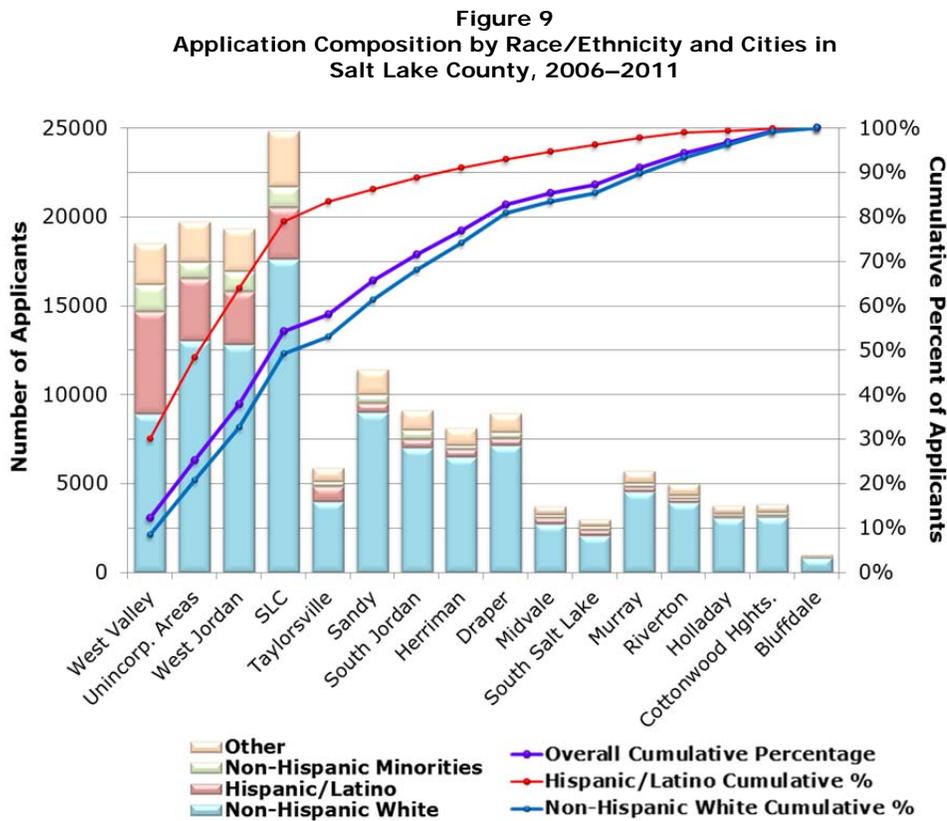
The applicant income distribution for Salt Lake City differs significantly between the two groups. While 48 percent of the non-Hispanic white applicants who selected Salt Lake City properties have incomes above 120 percent of the MSA median family income (MFI), only 14 percent of Hispanic applicants reported incomes in this bracket. Thus, the self-selection effect is particularly striking in Salt Lake City, where Hispanics mostly apply for the more affordable housing on the west side and the River District, while white applicants



Source: HMDA LAR Raw Data (2006–2011)

predominantly selected east side properties. See the fair housing equity assessment on Salt Lake City for more analysis on the self-selection effect.

With Salt Lake City as an exception, the income distributions between the two groups are in fact more similar within cities than across cities. For instance, both groups had roughly 14 percent of West Valley City applicants with reported incomes at or below 50 percent MFI. On the other hand, in southern cities such as Draper, Herriman, and Riverton, the share of applicants above the median family income is near or above 70 percent for both groups. *Thus, more affluent applicants, regardless of race, have a tendency to apply for properties in the southern part of the county, whereas lower-income applicants tend to select West Valley, West Jordan, Taylorsville, and South Salt Lake.* With the exception of Salt Lake City, the self-selection effect is more prominent across cities in the county rather than within cities. While *Figure 8* shows that the differences in income distributions are larger across cities than between the two groups within each city, it does not show the self-selection effect via application volume.

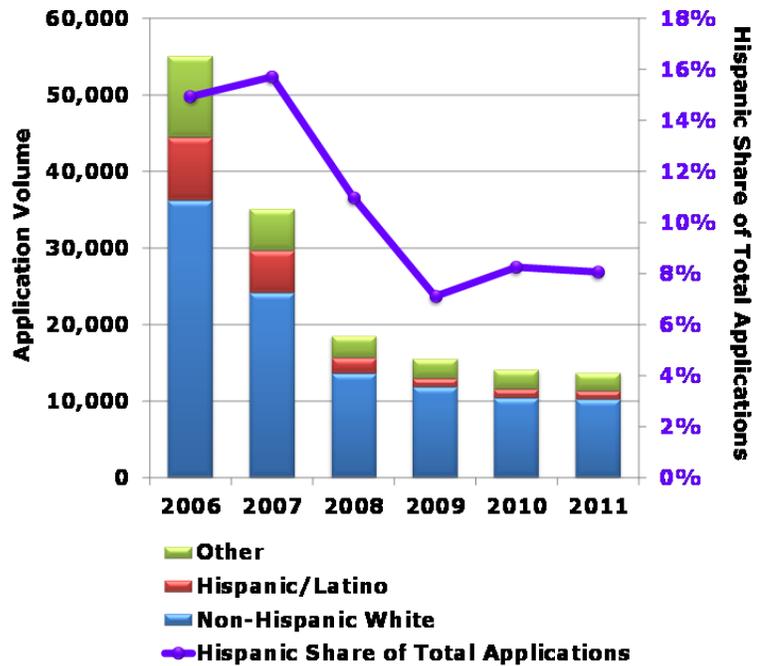


Source: HMDA LAR Raw Data by MSA (2006–2011)

Figure 9 shows the application composition for non-Hispanic white, Hispanic/Latino, and non-Hispanic minority applicants. The stacked bar graph also includes “Other” as a category, which encompasses all applications with co-applicants whose race/ethnicity is different from that of the applicant as well as any application with unspecified race/ethnicity from either the applicant or co-applicant. The bar graph component is ordered from left to right, starting with the city with the highest proportion of Hispanic/Latino applicants to the city with the lowest proportion.

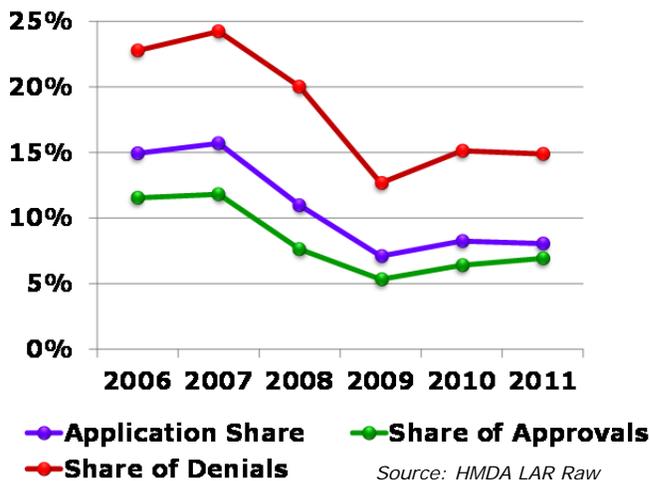
The line graphs in *Figure 9* show the cumulative percentages for the total and the respective race/ethnic groups. The cumulative percentages aggregate the proportion of applicants, starting from the left with West Valley City to the city that corresponds to a given point on the line graphs. *The purple line in Figure 9 shows that 54 percent of all Salt Lake County applications were for homes in West Valley City, unincorporated areas, West Jordan, and Salt Lake City. For Hispanic/Latino applicants, this cumulative percentage reaches nearly 79 percent. In fact, roughly three out of every ten Hispanic applicants who applied for Salt Lake County properties selected West Valley City.* On the other hand, the cumulative proportion of non-Hispanic white applicants who applied in these four areas barely reached the halfway mark. Given the concentration of Hispanic/Latino applications in these four cities/areas, the red cumulative percentage line in *Figure 9* is much more elevated than the total and non-Hispanic white cumulative percentage lines. Thus, *Figure 9* confirms that the self-selection effect in Salt Lake County is overwhelmingly concentrated in the northwestern part of the county.

Figure 10
Application Volume by Race/Ethnicity in Salt Lake County, 2006–2011



Source: HMDA LAR Raw Data by MSA (2006–2011)

Figure 11
Hispanic Share of Mortgage Applications, Approvals, and Denials in Salt Lake County, 2006–2011



Source: HMDA LAR Raw Data by MSA (2006–2011)

While the self-selection effect in the mortgage application process signals the intensification of segregation in Salt Lake County, the HMDA data also reveals an even larger symptom of homeownership impediments. *Figure 10* shows the drastic declining mortgage application volume from 2006 to 2011. The application volume in fact declined by 75 percent from 2006 to 2011. The purple line in *Figure 10* shows the Hispanic/Latino share of the total application volume. As the overall application volume decreased, the Hispanic/Latino share of the total county applicant pool also decreased precipitously from roughly 15 percent during the housing boom in 2006 to 2007 to 7 percent in 2009 before stabilizing at the 8 percent level in 2010 and 2011. The declining share of

Hispanic/Latino applications in the face of overall declining applications from 2006 to 2011 suggests systemic barriers to opportunity of participating in the mortgage application process. In other words, the declining Hispanic participation in the mortgage market could signal the further declining Hispanic homeownership rates in the county.

The purple line in *Figure 10*, representing the Hispanic share of total application volume, is juxtaposed in *Figure 11* with the Hispanic share of total approved and denied applications in Salt Lake County from 2006 to 2011. With the purple line (Hispanic application share) as the baseline, *Figure 11* shows that Hispanic/Latino applicants represent a disproportionately higher share of denials (red line) and a lower than expected share of approvals (green line). Interestingly, the gap between the application and approval share appears to be closing from 2009 to 2011, meaning that Hispanic share of total approvals are increasingly more commensurate with the Hispanic share of total applications. On the other hand, the differential between denial and application share has persisted from this 6-year period.

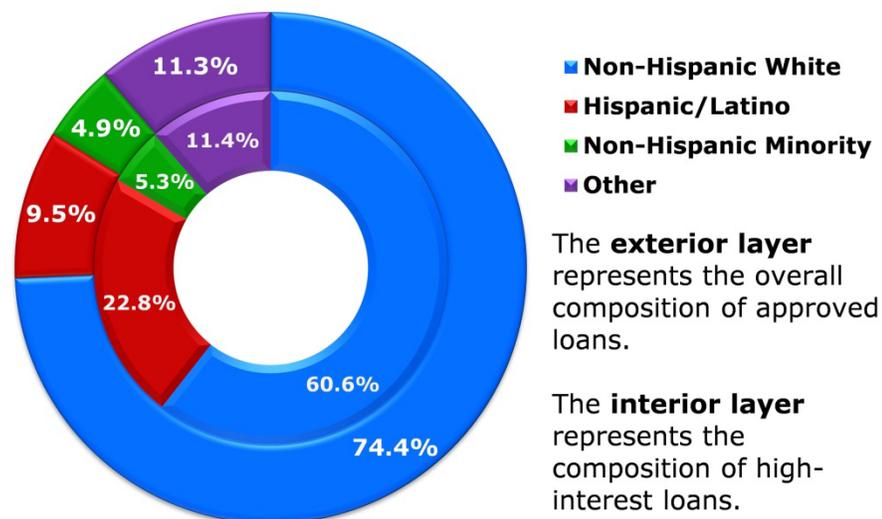
In addition to the barriers that Hispanic applicants face in the mortgage application process, the housing impediments persist following the approval process in the form of high-interest loans. Hispanic applicants receive a disproportionately high share of high-interest loans.

For the purposes of this study, high-interest loans are defined as any loan with a reported rate

spread that exceeds 3 percent for first liens and 5 percent for subordinate liens. This is the threshold that lenders have been required to disclose since 2004. The rate spread is the difference between the loan APR and the yield of comparable Treasury securities. The Federal Reserve Board selected this threshold with the intent that the rate spread for most subprime loans would be reported and that most prime loans would not require this disclosure.⁴ Thus, the rate spread disclosure will serve as a proxy for subprime lending.

Figure 12 shows the composition of approved loans and high-interest loans by race/ethnicity. While Hispanic/Latino applicants represented 9.5 percent of all approved loans from 2006 to 2011, they received a disproportionate 22.8 percent of all high-interest loans. Note that 92 percent of all high-

Figure 12
Composition of Approved Loans and High-Interest Loans in Salt Lake County, 2006–2011



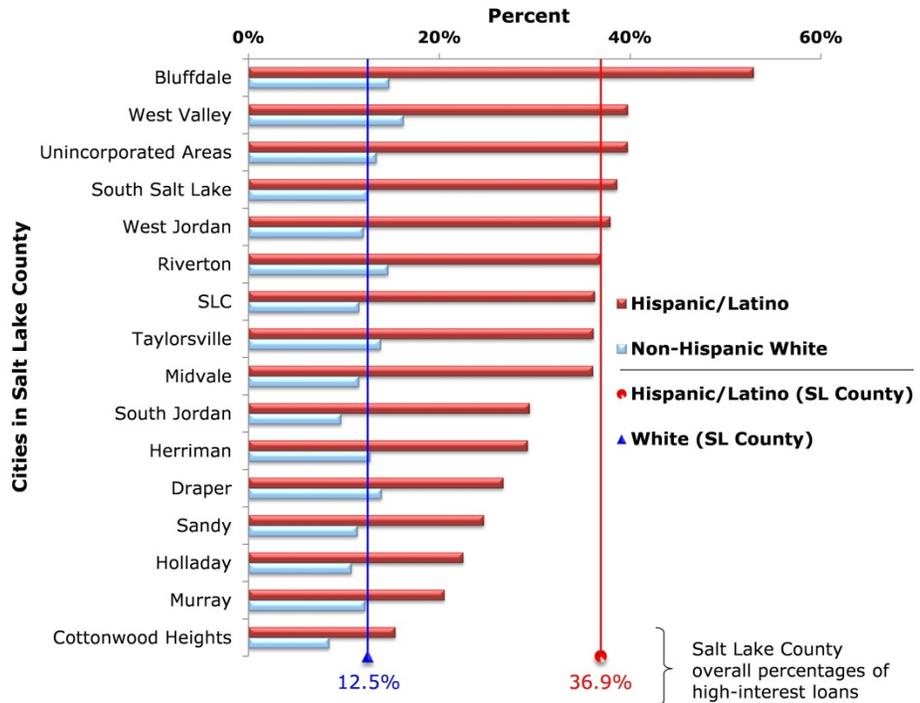
Source: HMDA LAR Raw Data by MSA (2006–2011)

⁴ Avery, Robert B., Kenneth P. Brevoort and Glenn B. Canner. "Opportunities and Issues in Using HMDA Data." *Journal of Real Estate Research* 29:4 (2007).

interest loans in Salt Lake County from 2006 to 2011 were in fact given during the peak of the housing boom in 2006 to 2007. *This disproportionately high share of high-interest loans among Hispanic applicants could be a precursor to foreclosures and thus increased housing instability.* Thus, even for Hispanics with approved mortgage loans, their higher tendency of receiving high-interest loans still reflects an underlying housing impediment that could have repercussions in long-term housing stability.

The disproportionately high prevalence of high-interest loans among Hispanic applicants is apparent across all cities in Salt Lake County. *Figure 13* shows the percent of high-interest loans among non-Hispanic white and Hispanic/Latino applicants during the 2006–2011 period. *At the county level, nearly 37 percent of Hispanic approved loans are considered high interest—nearly triple the rate among non-Hispanic white applicants.* The percentage of high-interest loans for Hispanic applicants selecting South Jordan, Herriman, Draper, Sandy, Holladay, Murray, and Cottonwood Heights are significantly lower than the county-level average. Nonetheless, the high-interest loan gap between the two groups still range from 7 to nearly 20 percentage points for these cities.

Figure 13
Percent of High-Interest Loans among Approved Applicants by Race/Ethnicity in Salt Lake County Cities, 2006–2011



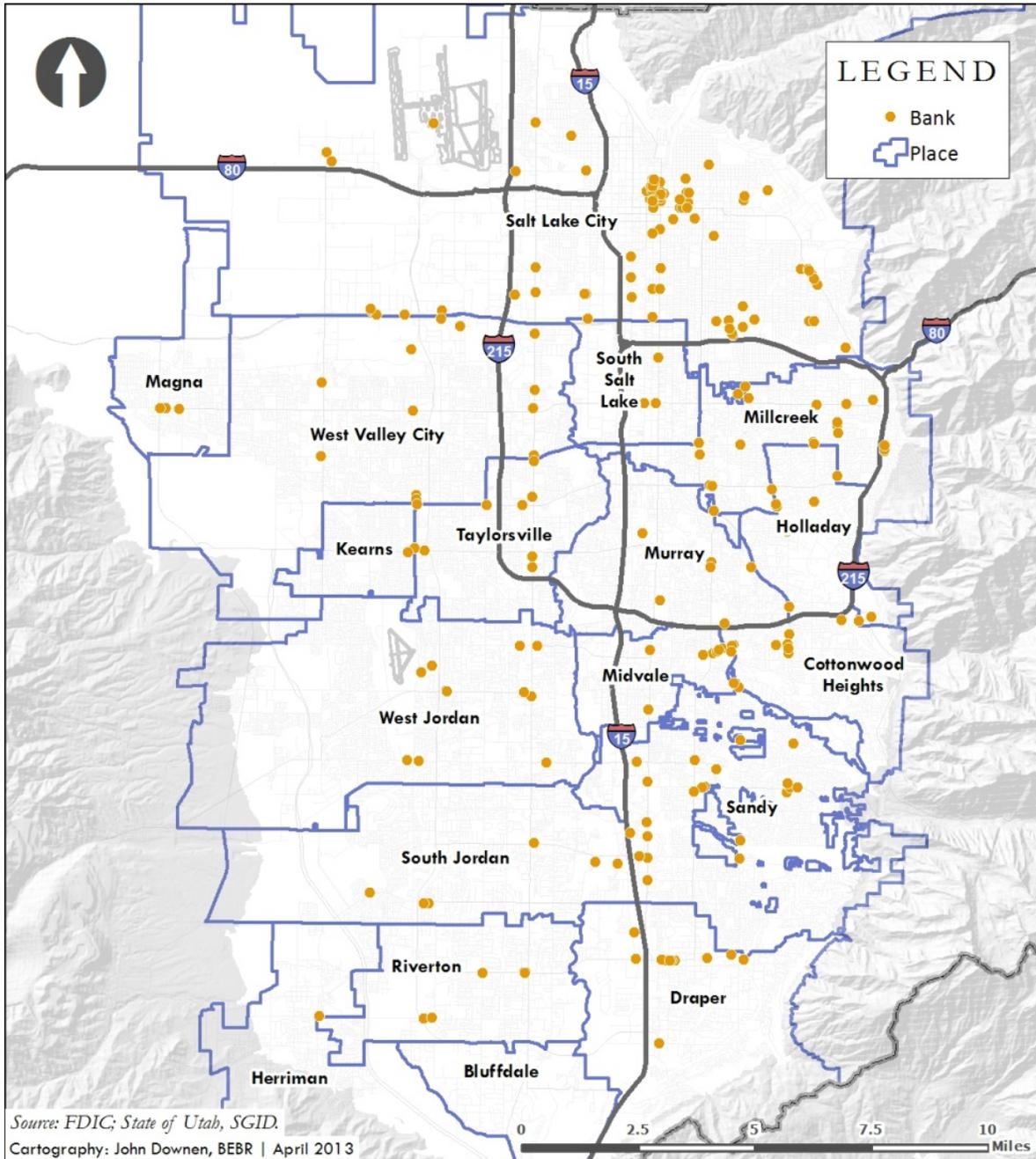
Source: HMDA LAR Raw Data by MSA (2006–2011)

Housing instability has implications in a larger context of infrastructural opportunity. Hispanic families, faced with higher-interest loans, could be forced to move frequently, resulting in elevated school mobility rates for their children. In turn, housing instability could result in lower educational opportunities. The county should examine housing and mortgage data in a broader context of opportunity.

Location of Commercial Banks and Branch Office – While lending practices show clear disparities in approval rates between Hispanics and non-Hispanic whites this outcome does not appear to be influenced by the location of bank offices. Of course there are many non-bank establishments (mortgage companies) that also provide mortgage financing not shown in *Figure 14*. Nevertheless, the proximity to banks is another factor in the opportunity assessment of a community not only for mortgage bank but personal banking as well. The spatial distribution of banks and branch offices does not show any glaring gap in availability of bank offices. There appears to be banking offices

spread reasonably evenly throughout the county, east and west sides, with a concentration of offices in the Central Business District of Salt Lake City.

Figure 14
Location of Commercial Banks and Branch Offices in Salt Lake County



Appendix

Explanation of Opportunity Indices

Index of Dissimilarity for Mortgage Denials and Approvals

The degree of difference between two distributions curves can be calculated using the index of dissimilarity. The formula⁵ for the index of dissimilarity Δ shown below is tailored specifically to describe the difference between the income distribution of mortgage applications and that of denied mortgage applications:

$$\Delta = \frac{1}{2} \sum_{i=1}^k \left| \frac{a_i}{A} - \frac{r_i}{R} \right|$$

where

a_i = the number of mortgage applications with reported incomes in the i^{th} income decile

A = the total number of mortgage applications

r_i = the number of denied applications with reported incomes in the i^{th} income decile

R = the total number of denied applications

The index of dissimilarity is interpreted as the percentage of one group that must move to other income deciles in order to create a distribution equal to that of the other group. For instance, in comparing the application volume and denial distributions across the countywide deciles, an index of dissimilarity of 0.03 means that 3 percent of the denied applicants would have to move to another income decile in order to match the overall application distribution. This index in itself cannot specify if approvals and denials are occurring disproportionately at certain income levels. Cumulative distribution curves of total applications and approved/denied applications can provide this information graphically.

⁵ Shryock, Henry S., Jacob S. Siegel and Associates. *The Methods and Materials of Demography*, ed. Edward G. Stockwell. Condensed Edition. San Diego: Academic Press, 1976.

SECTION III AFFORDABLE HOUSING NEEDS

When applied broadly to a housing market, the phrase “affordable housing need” is somewhat vague but, when applied to a narrow subgroup of owners and renters—very low-income households with severe housing problems—the need for affordable housing is no longer vague but apparent and acute. The need is substantial. In Salt Lake County there are 35,900 very low-income households with severe housing problems; 12,749 owners and 23,120 renters *Table 1*.

Very low-income households are defined as those households with income levels \leq 50 percent AMI. Severe housing problems are defined as those housing units that have any one of the four following conditions: (1) a cost burden of at least 50 percent of income for housing and utilities, (2) incomplete kitchen facilities, (3) incomplete plumbing (4) more than 1.5 persons per room. One in eight owner households have severe housing problems and almost 13,000 owner households in Salt Lake County are very low-income households with severe housing problems. About one quarter of all very low-income owners with severe housing problems are minority households; a total of 3,374 households.

For very low-income renter households the need for affordable housing is even greater. One in four renter households have severe housing problems, a total of 27,765 households. Minority and Hispanics renter households have a higher percentage of households with severe housing problems. For each about one-third of all renters have severe housing problems. Of very low-income renters over half have severe housing problems. A total of 23,120 renter households in Salt Lake County are very low-income households (\leq 50 percent AMI) with severe housing problems. Minority households account for 40 percent of all very low-income renter households with severe housing problems; a disproportionate share.

**Table 1
Owner and Renter Households with Severe Housing Problems by Race and Ethnicity
Salt Lake County**

	Owners		Renters		Total	
	Households	% Share	Households	% Share	Households	% Share
Total Households	229,635	100.0%	105,440	100.0%	335,075	100.0%
With Severe Housing Problems (SHP)	27,030	11.8%	27,765	26.3%	54,795	16.4%
Very Low-Income (VLI) with SHP	12,749	5.6%	23,120	21.9%	35,869	10.7%
VLI Whites with SHP	9,375	4.1%	13,950	13.2%	23,325	7.0%
VLI Minorities with SHP	3,374	1.5%	9,170	8.7%	12,544	3.7%
VLI Hispanics with SHP	2,645	1.2%	6,175	5.9%	8,820	2.6%

**Severe housing problems = any one of the following four conditions; incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, and cost burden greater than 50%.*

***VLI = very low-income households \geq 50% area median family income.*

Source: HUD CHAS Data Table 2. Derived from ACS 2006-2010.

There are 20,400 renters with severe housing *cost* burdens *Table 2*. Half of all very low-income renters have severe cost burdens. Forty percent of the very low-income renters with severe cost burdens live in Salt Lake City. *Table 3* shows the income distribution of renters in Salt Lake County, providing estimates on the magnitude of very low and extremely low-income renters.

Table 2
Renters with Severe Housing Problems and Severe Cost Burdens

	Renters with Severe Housing Problems*	% of Total Renters with Severe Housing Problems	VLI Renters with Severe Cost Burdens**	% of VLI Renters with Severe Cost Burdens
Bluffdale	90	27.3%	75	50.0%
Cottonwood Heights	510	15.6%	355	44.9%
Draper City	355	17.2%	300	69.0%
Herriman	50	11.2%	10	25.0%
Holladay	490	19.7%	410	49.7%
Midvale	1,305	23.2%	935	49.7%
Murray	1,290	23.2%	1,070	55.9%
Riverton	185	15.4%	125	36.2%
Salt Lake City	10,100	26.8%	8,010	46.6%
Sandy	1,340	26.1%	840	55.8%
South Jordan	420	24.8%	130	40.0%
South Salt Lake	1,575	31.5%	1,065	44.4%
Taylorsville	1,520	28.0%	1,160	53.0%
West Jordan	1,715	27.3%	1,135	53.2%
West Valley City	3,830	34.0%	2,510	46.9%
Salt Lake County	27,765	26.3%	20,390	49.1%

*Severe housing problems = any one of the following four conditions: incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, and cost burden greater than 50%.

**VLI = very low-income households >=50% area median family income. Severe cost burden is greater than 50% of income for housing.

Source: U.S. Census Bureau Data from HUD CHAS Query Tool.

Table 3
Income Distribution of Renters in Salt Lake County

	Renter Households	% Share of Renters
<= 30% HAMFI	22,350	21.2%
30% to <= 50% HAMFI	19,170	18.2%
>50% to <= 80% HAMFI	25,215	23.9%
>80% to <= 100% HAMFI	12,740	12.1%
>100% HAMFI	25,960	24.6%
Total	105,440	100.0%

Source: U.S. Census Bureau ACS (2006-2010) data using HUD CHAS Query Tool.

Affordable housing needs for other protected classes can be inferred from data in the HUD CDP mapping tool *Table 4*. Estimates of small and large households (familial status) and elderly (while not a protected class, half of all elderly 75+ years are disabled, which is a protected class) show that many very low-income households in these demographic groups have severe housing problems. And since these demographic groups include a sizeable share of protected class households we can infer that many of the households with severe housing problems are protected class households. Again the incidence of severe housing problems is much greater for renter households, particularly extremely low-income households (<30% AMI). The nearly 2,000 extremely low-income, elderly renter households with severe housing problems undoubtedly includes a fair number of disabled elderly renters *Table 4*. Of the nearly 1,400 extremely low-income, large related renter households at least 40 percent (560 households) are minority households. Large related minority renter households comprise 40 percent of all large related households in Salt Lake County.

Table 4
Owner and Renter Households with Severe Housing Problems
by Tenure and Household Type - Salt Lake County

	<30% AMI	30%-50% AMI	50%-80% AMI	Total
Owner Households				
Small Related	1,950	2,395	3,125	9,180
Large Related	860	1,220	89	3,365
Elderly	1,845	1,130	925	4,455
Renter Households				
Small Related	5,860	1,730	235	7,825
Large Related	1,375	740	130	2,245
Elderly	1,985	880	315	3,320

Source: Data from HUD CPD Maps tool.

The affordable housing needs of renters are particularly relevant in assessing the housing needs for protected classes. Minority, ethnic and large family households are disproportionately renters *Tables 5-6*. In Salt Lake County, 30 percent of white households are renters compared to 52 percent of minority households and 50 percent of Hispanic households. In South Salt Lake 80 percent of minority households rent, and in Midvale 70 percent of minority households rent. Twenty-five percent of all minority renters are large family renters households. In targeting affordable housing relief to households of protected classes it is imperative to focus on the development and rehabilitation of affordable rental units.

Table 5
Percent of Households that Rent

	White Households	Minority Households	Hispanic Households
Bluffdale	18.0%	46.8%	43.5%
Cottonwood Heights	27.2%	45.9%	54.0%
Draper	20.3%	35.4%	29.8%
Herriman	11.3%	20.4%	24.5%
Holladay	23.9%	52.4%	62.4%
Midvale	47.9%	71.9%	71.2%
Murray	30.6%	61.9%	58.9%
Riverton	13.0%	28.1%	27.7%
Salt Lake City	48.2%	67.2%	62.7%
Sandy	19.0%	36.0%	39.9%
South Jordan	14.7%	24.3%	25.2%
South Salt Lake	55.7%	80.3%	80.0%
Taylorsville	26.0%	52.7%	50.6%
West Jordan	20.4%	39.0%	38.3%
West Valley	25.2%	43.7%	43.8%
Salt Lake County	29.6%	52.4%	50.4%

Source: U.S. Census Bureau.

Table 6
Large Family Renter Households
(Large family = five or more persons)

	Total Renter Households			Minority Renter Households		
	Renters Households	Large Family Renter Households	Large Family Share of Renters	Total Renter Households	Large Family Renter Households	Large Family Share of Renters
Davis	20,474	3,282	16.0%	2,849	655	23.0%
Salt Lake	112,203	15,728	14.0%	24,876	6,406	25.8%
Utah	44,549	9,144	20.5%	5,954	1,850	31.1%
Weber	21,619	3,127	14.5%	4,377	1,023	23.4%

Source: U.S. Census Bureau.

Another measure of affordability was provided by HUD to Sustainable Communities grantees. For each municipality HUD has estimated, by income category, the deficit/surplus of affordable rental housing units (renter and owner) *Table 7*. These estimates should not be interpreted as the need for *new* units but rather an indication of rental housing affordability for different income groups. In those cities with large deficits of affordable units the residents are likely to have relatively high housing cost burdens and difficulty finding rental housing. Sandy has the largest deficit of affordable housing. In contrast there are three cities with surpluses of affordable housing; Midvale, Salt Lake City, and South Salt Lake. The housing affordability in these cities is due primarily to the large share of rent assisted (tax credit, public housing, etc.) housing in the city. For example, nearly half of the 9,000 tax credit units in Salt Lake County are located in Salt Lake City, which contributes to the surplus of affordable rental housing in Salt Lake City.

Table 7
Deficit/Surplus of Affordable Rental Housing Units by Income
(shaded area = high availability of affordability rental units)

	<30% AMI Deficit/Surplus	30%-50% AMI Deficit/Surplus	51%-80% AMI Deficit/Surplus	Total
Bluffdale	-80	-157	-234	-470
Cottonwood Heights	-707	-1,211	-836	-2,754
Draper	-668	-1,220	-1,418	-3,306
Holladay	-558	-762	-661	-1,980
Midvale	-549	-236	+1,193	+408
Murray	-972	-874	-151	-1,997
Riverton	-482	-869	-1,304	-2,656
Salt Lake City	-1,584	+2,762	+5,248	+6,426
Sandy	-1,661	-2,908	-3,547	-8,115
South Jordan	-752	-1,376	-2,071	-4,199
South Salt Lake	-263	+914	+1,222	+1,873
West Jordan	-1,388	-2,263	-1,782	-5,433
Herriman	-269	-522	-773	-1,564
West Valley City	-1,893	-1,668	-80	-3,642
Taylorsville	-1,151	-1,370	-606	-3,128
Unincorporated Salt Lake County	-2,347	-4,249	-5,116	-11,712
Total	-15,322	-16,009	-10,917	-42,248

Source: HUD Sustainable Communities spreadsheet for grantees.

For a more detailed look at housing needs, the following tables show the number and share of owner-occupied households with severe housing problems in Salt Lake County and the entitlement

cities by income and race/ethnicity. Note that the values in these tables represent the lower bounds of 95 percent confidence intervals. Tables are not provided for Sandy and South Jordan due to large margins of error in the HUD Comprehensive Housing Affordability Strategy (CHAS) data.

Owner Households: Minority and Hispanic (Tables 8-17)

Over 24,000 owner-occupied households in Salt Lake County have severe housing problems which include lack of kitchen of plumbing, more than 1 person per room, and housing cost burden amounting to more than 50 percent of total income. In Salt Lake City, over 4,000 owner-occupied household have severe housing problems, while West Valley City has over 3,200. Despite the slight difference in the lower-bound values between the two cities, both Salt Lake City and West Valley City have lower-bound values of roughly 1,000 Hispanic owner households with severe housing problems.

Over one in five Hispanic owner households have severe housing problems, compared to only a tenth of non-Hispanic white owner households. This disparity in housing problems cannot be explained by inherent differences in incomes across racial and ethnic groups. In fact, across all income levels, Hispanics have a higher prevalence of severe housing problems than among non-Hispanic whites. Over 57 percent of Hispanic owner-occupied households below 50 percent of the area median family income have severe housing problems, compared to only 40 percent of non-Hispanic whites in this low-income bracket. In Salt Lake City, the disparity is even greater: over one in four Hispanic owner households have severe housing problems, compared to only 8 percent of non-Hispanic white owner households.

The comparability between non-Hispanic white and Hispanic households often break down for smaller cities due to the large margins of error stemming from small sample sizes. For instance, the lower-bound percentages for Hispanic owner-occupied households in West Jordan are lower than those of non-Hispanic white owner-occupied households for all income brackets since the margins of error for Hispanics are generally larger due to their relatively small population for sampling purposes. In other words, while the point-estimate percentages of households with heavy cost burden for Hispanics are larger than for their non-Hispanic white counterparts in nearly all income brackets, the large margins of errors among Hispanics lead to smaller lower bounds. Thus, these lower bound values and percentages for small cities should be interpreted for the basic purpose of understanding the existence of housing need rather than for making specific comparisons across groups. Nonetheless, the disparity resurfaces when all incomes are aggregated. Over 13 percent of Hispanic owner households in West Jordan have severe housing problems, compared to only 8 percent of non-Hispanic white owner households.

Note that the CHAS data, from which the following tables were constructed, is based on the American Community Survey (ACS) data from 2005-2009. This 5-year period spans both the housing boom and crash. Thus, higher prevalence of severe housing problems among Hispanics and minorities could be symptomatic of unfair lending practices during the housing bubble, especially subprime and high-interest mortgage loans. Please refer to the Lending Practices section of the Salt Lake County Fair Housing Equity Assessment for further analysis of high-interest loans.

Table 8
Owner Households with Severe Housing Problems by Income
and Race/Ethnicity in Salt Lake County, 2005–2009

	Owner-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	18,624	13,915	2,976	4,254
<50%	11,777	8,984	1,831	2,434
50%-80%	6,391	4,549	944	1,564
80%-100%	2,043	1,470	290	359
100%+	3,371	2,453	426	712
Total	24,734	18,384	4,007	5,754

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The values above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound value for the total.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 9
Percent of Owner Households with Severe Housing Problems by Income and
Race and Ethnicity in Salt Lake County, 2005–2009

	Owner-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	29.3%	27.1%	34.4%	35.8%
<50%	44.3%	40.9%	57.8%	59.3%
50%-80%	17.4%	15.6%	17.7%	21.1%
80%-100%	7.0%	6.0%	9.8%	8.3%
100%+	2.5%	2.0%	6.0%	5.8%
Total	10.8%	9.2%	21.2%	19.9%

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The percentages above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound value for the total.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 10
Owner Households with Severe Housing Problems by Income
and Race/Ethnicity in Salt Lake City, 2005–2009

	Owner-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	3,349	1,947	823	1,079
<50%	2,133	1,286	463	588
50%-80%	1,038	512	262	331
80%-100%	152	117	— ¹	— ¹
100%+	334	225	31	— ¹
Total	4,094	2,489	956	1,247

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The values above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound value for the total.

¹ The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 11
Percent of Owner Households with Severe Housing Problems by Income and Race and Ethnicity in Salt Lake City, 2005–2009

	Owner-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	30.6%	24.5%	42.7%	45.7%
<50%	41.4%	33.5%	58.0%	27.7%
50%-80%	18.4%	12.8%	26.9%	24.2%
80%-100%	3.3%	3.2%	— ¹	— ¹
100%+	1.6%	1.2%	3.5%	— ¹
Total	11.1%	8.2%	25.7%	21.9%

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The percentages above represent the lower bounds of 95% confidence intervals.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 12
Owner Households with Severe Housing Problems by Income and Race/Ethnicity in Taylorsville, 2005–2009

	Owner-Occupied Households	Non-Hispanic White	Hispanic	Minorities ²
<80% HAMFI	911	738	42	—
<50%	537	439	— ¹	—
50%-80%	271	201	19	—
80%-100%	9	— ¹	— ¹	—
100%+	68	9	— ¹	—
Total	1,105	839	87	—

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The values above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound value for the total.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

2 With the exception of Hispanics, nearly all minority categories had zero point estimates for all income brackets. This led to inflated margins of error when all minority categories were aggregated. For each income bracket with multiple zero point estimates across the minority categories, only one zero point estimate was used in aggregating the minority margin of error. Even with this adjustment, the minority lower-bound values were still negative due to the low point estimates and large margins of error.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 13
Percent of Owner Households with Severe Housing Problems by Income and Race and Ethnicity in Taylorsville, 2005–2009

	Owner-Occupied Households	Non-Hispanic White	Hispanic	Minorities ²
<80% HAMFI	22.2%	21.2%	1.0%	—
<50%	35.4%	32.8%	— ¹	—
50%-80%	11.0%	10.0%	14.2%	—
80%-100%	0.6%	— ¹	— ¹	—
100%+	0.9%	0.1%	0.2%	—
Total	7.9%	7.2%	7.9%	—

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The percentages above represent the lower bounds of 95% confidence intervals.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

2 With the exception of Hispanics, nearly all minority categories had zero point estimates for all income brackets. This led to inflated margins of error when all minority categories were aggregated. For each income bracket with multiple zero point estimates across the minority categories, only one zero point estimate was used in aggregating the minority margin of error. Even with this adjustment, the minority lower-bound values were still negative due to the low point estimates and large margins of error.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 14
Owner Households with Severe Housing Problems by Income and Race/Ethnicity in West Jordan, 2005–2009

	Owner-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	1,776	1,290	212	228
<50%	1,030	794	137	32 ²
50%-80%	587	387	6	56
80%-100%	66	19	— ¹	— ¹
100%+	136	96	— ¹	— ¹
Total	2,176	1,532	299	304

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The values above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound value for the total.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

2 With the exception of Hispanics, nearly all minority categories had zero point estimates in the <30% HAMFI and 30%-50% HAMFI income categories. This led to inflated margins of error when all minority categories were aggregated to <50% HAMFI. For each income bracket with multiple zero point estimates across the minority categories, only one zero point estimate was used in aggregating the minority margin of error. Even with this adjustment, the minority lower-bound value at <50% HAMFI was still lower than that of Hispanics in the same income bracket.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 15
Percent of Owner Households with Severe Housing Problems by Income and Race and Ethnicity in West Jordan, 2005–2009

	Owner-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	28.5%	27.0%	23.9%	24.2%
<50%	49.3%	45.5%	11.1%	— ¹
50%-80%	14.7%	13.3%	1.8%	8.8%
80%-100%	2.0%	0.7%	— ¹	— ¹
100%+	1.0%	0.8%	— ¹	— ¹
Total	9.3%	7.6%	13.4%	11.3%

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The percentages above represent the lower bounds of 95% confidence intervals.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 16
Owner Households with Severe Housing Problems by Income and Race/Ethnicity in West Valley City, 2005–2009

	Owner-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	2,362	1,236	694	835
<50%	1,542	859	369	433
50%-80%	668	262	228	254
80%-100%	211	77	16	— ¹
100%+	409	100	136	207
Total	3,252	1,550	1,002	1,346

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The values above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound value for the total.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 17
Percent of Owner Households with Severe Housing Problems by Income and Race and Ethnicity in West Valley City, 2005–2009

	Owner-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	27.4%	21.1%	34.7%	35.0%
<50%	46.6%	37.6%	63.0%	25.3%
50%-80%	12.9%	7.6%	18.1%	17.2%
80%-100%	5.0%	2.6%	2.4%	— ¹
100%+	3.4%	1.1%	9.2%	8.9%
Total	13.0%	8.5%	22.3%	21.7%

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The percentages above represent the lower bounds of 95% confidence intervals.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Renter Households: Minority and Hispanic (Tables 18-27)

The following tables show the number and percentage of renter households with severe housing problems in Salt Lake County and the entitlement cities by income and race/ethnicity. Note that the values and percentages presented in the following tables represent 95 percent confidence interval lower bounds. Tables are not provided for Sandy and South Jordan due to large margins of error in the HUD Comprehensive Housing Affordability Strategy (CHAS) data.

Over 23,000 rental households in Salt Lake County have severe housing problems representing over 23 percent of the total rental households in the county. While the lower-bound numbers of rental and owner households with severe housing problems in Salt Lake County are similar in magnitude, Salt Lake City has significantly more renter households with severe housing problems. Over 8,500 rental households in Salt Lake City have severe housing problems, representing over a quarter of the total rental households in the city. The lower-bound number of rental households with severe housing problems in Salt Lake City is more than twice the lower-bound number of owner households with severe housing problems in the city.

A third of Hispanic and minority renter households in Salt Lake County have severe housing problems, compared to only a fifth of non-Hispanic white renter households. Interestingly, this gap disappears among very low-income renter households (less than 50 percent HAMFI), half of which have severe housing problems regardless of race or ethnicity. The gap resurfaces in Salt Lake County for all income brackets above 50 percent HAMFI. In fact, for Salt Lake City, Taylorsville, and West Valley City, over 45 percent of both non-Hispanic white and Hispanic renter households below 50 percent HAMFI have severe housing problems.

West Jordan is the only case in which lower-bound percentages for Hispanic rental households are lower than those of non-Hispanic white rental households in the income brackets below 80 percent HAMFI. This stems from the generally large margins of error for Hispanics due to their relatively small population for sampling purposes. In other words, while the point estimate percentages of households with heavy cost burden for Hispanics are larger than for their non-Hispanic white counterparts in nearly all income brackets, the large margins of errors among Hispanics often lead to smaller lower bounds. Thus, these lower bound values and percentages should be interpreted for the basic purpose of understanding the existence of housing need rather than for making specific comparisons across groups. Nonetheless, the gap still exists in West Jordan when all income levels are aggregated. More than a fifth of Hispanic and minority renter households in West Jordan have severe housing problems, compared to only a tenth of non-Hispanic white renter households.

Since Hispanics tend to have larger households, they might incur higher rental costs in order to accommodate more family members. Thus, subsidized housing in Salt Lake County should be evaluated not only on the basis of meeting overall need but also on the ability to accommodate large households.

Table 18
Renter Households with Severe Housing Problems by Income
and Race and Ethnicity in Salt Lake County

	Renter-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	22,120	13,429	5,225	8,087
<50%	19,959	12,426	4,400	6,952
50%-80%	1,813	794	587	859
80%-100%	405	157	85	51
100%+	813	253	227	433
Total	23,889	14,118	5,832	9,080

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The values above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound value for the total.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 19
Percent of Renter Households with Severe Housing Problems by Income and
Race and Ethnicity in Salt Lake County

	Renter-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	34.3%	30.9%	37.6%	39.4%
<50%	51.1%	48.5%	50.5%	53.3%
50%-80%	7.2%	4.5%	11.8%	11.9%
80%-100%	3.4%	1.7%	5.5%	2.3%
100%+	3.5%	1.4%	10.4%	9.4%
Total	23.9%	19.8%	32.4%	32.4%

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The percentages above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound value for the total.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 20
Renter Households with Severe Housing Problems by Income
and Race and Ethnicity in Salt Lake City, 2005–2009

	Renter-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	8,194	5,026	1,597	2,853
<50%	7,697	4,796	1,401	2,618
50%-80%	322	126	72	63
80%-100%	45	3	— ¹	— ¹
100%+	47	2	— ¹	— ¹
Total	8,578	5,148	1,726	2,947

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The values above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound value for the total.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 21
Percent of Renter Households with Severe Housing Problems by Income and Race and Ethnicity in Salt Lake City, 2005–2009

	Renter-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	34.1%	31.2%	35.1%	38.2%
<50%	49.8%	47.6%	45.9%	52.8%
50%-80%	3.8%	2.1%	5.5%	3.0%
80%-100%	1.2%	0.1%	— ²	— ¹
100%+	0.6%	0.0%	— ¹	— ¹
Total	24.1%	20.9%	29.6%	29.6%

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The percentages above represent the lower bounds of 95% confidence intervals.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

2 This lower-bound percentage is positive but are omitted from the table above, since the corresponding lower-bound value is negative.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 22
Renter Households with Severe Housing Problems by Income and Race and Ethnicity in Taylorsville, 2005–2009

	Renter-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	914	415	242	266
<50%	851	394	219	258
50%-80%	6	— ¹	— ¹	— ¹
80%-100%	— ¹	— ¹	— ¹	— ¹
100%+	— ¹	— ¹	— ¹	— ¹
Total	1,039	377	288	286

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The values above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound value for the total.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 23
Percent of Renter Households with Severe Housing Problems by Income and Race and Ethnicity in Taylorsville, 2005–2009

	Renter-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	28.9%	24.2%	31.9%	33.9%
<50%	48.0%	49.3%	49.2%	8.2%
50%-80%	0.6%	— ¹	— ¹	— ¹
80%-100%	— ¹	— ¹	— ¹	— ¹
100%+	— ¹	— ¹	— ¹	— ¹
Total	20.7%	11.8%	30.7%	26.9%

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The percentages above represent the lower bounds of 95% confidence intervals.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 24
Renter Households with Severe Housing Problems by Income
and Race and Ethnicity in West Jordan, 2005–2009

	Renter-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	845	345	190	259
<50%	692	300	150	184
50%-80%	69	7	7	— ¹
80%-100%	— ¹	— ¹	— ¹	— ¹
100%+	31	— ¹	2	— ¹
Total	955	394	186	236

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The values above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound value for the total.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 25
Percent of Renter Households with Severe Housing Problems by Income and
Race and Ethnicity in West Jordan, 2005–2009

	Renter-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	25.6%	16.3%	17.3%	5.7%
<50%	42.4%	29.6%	15.3%	— ¹
50%-80%	4.6%	0.9%	5.6%	— ¹
80%-100%	— ¹	— ¹	— ¹	— ¹
100%+	2.4%	0.1%	10.4%	— ¹
Total	17.4%	10.4%	22.9%	29.0%

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The percentages above represent the lower bounds of 95% confidence intervals.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 26
Renter Households with Severe Housing Problems by Income
and Race and Ethnicity in West Valley City, 2005–2009

	Renter-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	2,480	992	912	1,245
<50%	2,178	941	737	1,021
50%-80%	152	6	67	61
80%-100%	26	— ¹	— ¹	— ¹
100%+	66	— ¹	8	— ¹
Total	2,845	1,053	1,032	1,433

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The values above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound value for the total.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Table 27
Percent of Renter Households with Severe Housing Problems by Income and Race and Ethnicity in West Valley City, 2005–2009

	Renter-Occupied Households	Non-Hispanic White	Hispanic	Minorities
<80% HAMFI	33.8%	27.9%	33.9%	37.9%
<50%	48.2%	45.1%	45.9%	52.6%
50%-80%	5.8%	0.6%	7.6%	7.0%
80%-100%	2.9%	— ¹	— ¹	— ¹
100%+	3.0%	— ¹	4.1%	— ²
Total	26.4%	19.3%	29.5%	31.5%

Note: Severe housing problems are defined as lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50% of income.

Note: The percentages above represent the lower bounds of 95% confidence intervals.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

2 This lower-bound percentage is positive but is omitted, since the corresponding lower-bound value is negative.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 2

Large Families with Severe Housing Cost Burden (Tables 28-37)

The number of large family owner and renter households in Salt Lake County and the entitlement cities with severe cost burden are shown in the following tables by income levels. The value and percentages in both tables represent 95 percent confidence interval lower bounds. Tables are not provided for Sandy and South Jordan due to large margins of error in the CHAS data.

Table 28
Large Family Owner Households by Income and Cost Burden in Salt Lake County, 2005–2009

Income as Percent of HUD Area Median Family Income	Cost Burden: Percent of Income Devoted to Housing Cost			Percentage with >50% Cost Burden
	<50%	>50%	Total	
<80% HAMFI	7,463	2,324	10,132	22%
<50%	1,205	1,546	2,993	48%
50%-80%	6,027	620	6,812	8%
>80% HAMFI	28,311	235	28,737	1%
Total	36,288	2,686	39,427	7%

Note: The values and percentages above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound value for the total.

Note: Large family households as defined as having five or more family members.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 7

For both large family owner and renter households, severe housing cost burden is mostly concentrated among those with incomes below 50 percent of the median family income. Over 48 percent of large family owner households and 37 percent of large family renter households in Salt Lake County below 50 percent of the median family income have severe housing cost burden. Overall, only 7 percent of total large family owner households and 16 percent of large family renter households in Salt Lake County have severe housing cost burden. More importantly subsidized housing efforts to accommodate large family households in Salt Lake County also face the challenge of providing housing affordability below 50 percent of the area median family income.

Note that for most of the entitlement cities, the lower-bound values of large family households with severe cost burden are not provided for income levels above 80 percent median family income due to low point estimates and large margins of error. Given that the city-level margins of error are larger than that of the county, the city lower-bound values could easily underestimate that actual numbers of large family owner and renter households with severe housing cost burden. The numbers in the following tables should only be used as a general reference that demonstrates the existence of need rather than the specific magnitude of need due to the large margins of error in the CHAS data.

Table 29
Large Family Renter Households by Income and Cost Burden in
Salt Lake County, 2005–2009

Income as Percent of HUD Area Median Family Income	Cost Burden: Percent of Income Devoted to Housing Cost			Percentage with >50% Cost Burden
	<50%	>50%	Total	
<80% HAMFI	4,288	1,621	6,240	24%
<50%	1,987	1,532	3,780	37%
50%-80%	2,053	29	2,181	1%
>80% HAMFI	2,608	— ¹	2,608	— ¹
Total	7,212	1,595	9,187	16%

Note: The values and percentages above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values for the two cost burden categories do not necessarily sum to the lower-bound value for the total.

Note: Large family households as defined as having five or more family members.

1 The lower-bound value for this cross-tabulated cell is negative, since the point estimate is zero.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 7

Table 30
Large Family Owner Households by Income and Cost Burden in
Salt Lake City, 2005–2009

Income as Percent of HUD Area Median Family Income	Cost Burden: Percent of Income Devoted to Housing Cost			Percentage with >50% Cost Burden
	<50%	>50%	Total	
<80% HAMFI	887	255	1,328	17%
<50%	167	173	499	29%
50%-80%	591	19	702	2%
>80% HAMFI	2,162	— ¹	2,192	— ¹
Total	3,253	264	3,718	6%

Note: The values and percentages above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound values for the total.

Note: Large family households as defined as having five or more family members.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 7

Table 31
Large Family Renter Households by Income and Cost Burden in
Salt Lake City, 2005–2009

Income as Percent of HUD Area Median Family Income	Cost Burden: Percent of Income Devoted to Housing Cost			Percentage with >50% Cost Burden
	<50%	>50%	Total	
<80% HAMFI	759	281	1,177	21%
<50%	428	268	822	28%
50%-80%	205	— ¹	217	— ¹
>80% HAMFI	341	— ¹	356	— ¹
Total	1,253	232	1,688	12%

Note: The values and percentages above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values for the two cost burden categories do not necessarily sum to the lower-bound values for the total.

Note: Large family households as defined as having five or more family members.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 7

Table 32
Large Family Owner Households by Income and Cost Burden in
Taylorsville, 2005–2009

Income as Percent of HUD Area Median Family Income	Cost Burden: Percent of Income Devoted to Housing Cost			Percentage with >50% Cost Burden
	<50%	>50%	Total	
<80% HAMFI	378 ²	41	582	6%
<50%	— ¹	26	68	36%
50%-80%	397	— ¹	440	— ¹
>80% HAMFI	1,136	— ¹	1,146	— ¹
Total	1,636	49	1,838	2%

Note: The values and percentages above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound values for the total.

Note: Large family households as defined as having five or more family members.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

2 The number of large family owner households <80% HAMFI with <50% housing cost burden has a lower bound less than that of the 50%-80% HAMFI subcategory due to calculations in aggregating margins of error. The margins of error at the <80% HAMFI income bracket incurred margins of error associated with low point estimates for some income subcategories. Even with adjustments to avoid incurring multiple margins of error associated with zero point estimates when aggregating income categories, the lower bound for aggregated income categories could still be lower than that of the associated income subcategories.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 7

Table 33
Large Family Renter Households by Income and Cost Burden in
Taylorsville, 2005–2009

Income as Percent of HUD Area Median Family Income	Cost Burden: Percent of Income Devoted to Housing Cost			Percentage with >50% Cost Burden
	<50%	>50%	Total	
<80% HAMFI	38 ²	59	271	18%
<50%	— ¹	48	151	27%
50%-80%	42	— ¹	50	— ¹
>80% HAMFI	50	— ¹	53	— ¹
Total	174	— ³	403	1%

Note: The values and percentages above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values for the two cost burden categories do not necessarily sum to the lower-bound values for the total.

Note: Large family households as defined as having five or more family members.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

2 The number of large family renter households <80% HAMFI with <50% housing cost burden has a lower bound less than that of the 50%-80% HAMFI subcategory due to calculations in aggregating margins of error. The margins of error at the <80% HAMFI income bracket incurred margins of error associated with zero point estimates for some income subcategories. Even with adjustments to avoid incurring multiple margins of error associated with zero point estimates when aggregating income categories, the lower bound for aggregated income categories could still be lower than that of the associated income subcategories.

3 The total large family renter households with >50% cost burden has a negative lower bound due to large margins of error incurred by the zero point estimate at the >80% HAMFI income bracket.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 7

Table 34
Large Family Owner Households by Income and Cost Burden in
West Jordan, 2005–2009

Income as Percent of HUD Area Median Family Income	Cost Burden: Percent of Income Devoted to Housing Cost			Percentage with >50% Cost Burden
	<50%	>50%	Total	
<80% HAMFI	1,031	260	1,438	16%
<50%	72	153	359	36%
50%-80%	832	39	948	4%
>80% HAMFI	3,434	— ¹	3,475	— ¹
Total	4,663	269	5,108	5%

Note: The values and percentages above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound values for the total.

Note: Large family households as defined as having five or more family members.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 7

Table 35
Large Family Renter Households by Income and Cost Burden in
West Jordan, 2005–2009

Income as Percent of HUD Area Median Family Income	Cost Burden: Percent of Income Devoted to Housing Cost			Percentage with >50% Cost Burden
	<50%	>50%	Total	
<80% HAMFI	184	— ¹	369	— ¹
<50%	— ¹	41	154	23%
50%-80%	134	— ¹	138	— ¹
>80% HAMFI	1	— ¹	67	— ¹
Total	302	— ²	520	— ²

Note: The values and percentages above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values for the two cost burden categories do not necessarily sum to the lower-bound values for the total.

Note: Large family households as defined as having five or more family members.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

2 The total large family renter households with >50% cost burden has a negative lower bound due to large margins of error incurred by the zero point estimates for all income brackets >50% HAMFI. Even with adjustments to avoid incurring multiple margins of error associated with zero point estimates, the lower bound for the total large family renter households with >50% cost burden was still negative.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 7

Table 36
Large Family Owner Households by Income and Cost Burden in
West Valley City, 2005–2009

Income as Percent of HUD Area Median Family Income	Cost Burden: Percent of Income Devoted to Housing Cost			Percentage with >50% Cost Burden
	<50%	>50%	Total	
<80% HAMFI	1,291	208	1,641	11%
<50%	189	146	430	28%
50%-80%	1,000	9	1,079	1%
>80% HAMFI	2,764	— ¹	2,779	— ¹
Total	4,254	157 ²	4,627	3%

Note: The values and percentages above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values of the cross-tabulated parts do not necessarily sum to the lower-bound values for the total.

Note: Large family households as defined as having five or more family members.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

2 Most of the large family owner households with >50% cost burden are in the <80% HAMFI income bracket. The lower bound of the total large family owner households with > 50% cost burden is lower than that of the <80% HAMFI income bracket due to the large margins of error incurred from the >80% HAMFI income category.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 7

Table 37
Large Family Renter Households by Income and Cost Burden in
West Valley City, 2005–2009

Income as Percent of HUD Area Median Family Income	Cost Burden: Percent of Income Devoted to Housing Cost			Percentage with >50% Cost Burden
	<50%	>50%	Total	
<80% HAMFI	776	112	1,055	9%
<50%	352	87	610	12%
50%-80%	289	— ¹	304	— ¹
>80% HAMFI	351	— ¹	396	— ¹
Total	1,316	— ²	1,596	3%

Note: The values and percentages above represent the lower bounds of 95% confidence intervals. Thus, the lower-bound values for the two cost burden categories do not necessarily sum to the lower-bound values for the total.

Note: Large family households as defined as having five or more family members.

1 The lower bounds of these cross-tabulated cells are negative due to low point estimates and/or large margins of error.

2 The total large family renter households with >50% cost burden has a negative lower bound due to large margins of error incurred by the zero point estimates for all income brackets >50% HAMFI. Even with adjustments to avoid incurring multiple margins of error associated with zero point estimates, the lower bound for the total large family renter households with >50% cost burden was still negative.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2005-2009, Table 7

FAIR HOUSING AND EQUITY ASSESSMENT SUMMARY

HUD requires the Fair Housing and Equity Assessment (FHEA) to discuss four characteristics of cities and counties in the study area. These characteristics are: (1) recent demographic trends, (2) segregation, i.e. concentration of protected classes, (3) racially concentrated areas of poverty, and (4) disparities in opportunity regarding, among other attributes, affordable housing, proximity to employment, and quality of local schools. The FHEA examines in detail each of these principal characteristics. For each characteristic a number of related attributes are presented in tables and maps. The maps show the spatial distribution of a particular attribute, such as the location of Section 8 voucher holders while the tables provide numerical estimates and indices.

A summary of five key FHEA attributes for each city is presented in *Table 1*. The most recent estimate for each attribute is included. HUD defines entitlement cities as those with a population of more than 50,000. Entitlement cities receive Community Development Block Grants (CDBG) directed toward revitalizing neighborhoods, economic development, and providing improved community facilities and services. Non-entitlement cities receive funding through the county or state for CDBG activities.

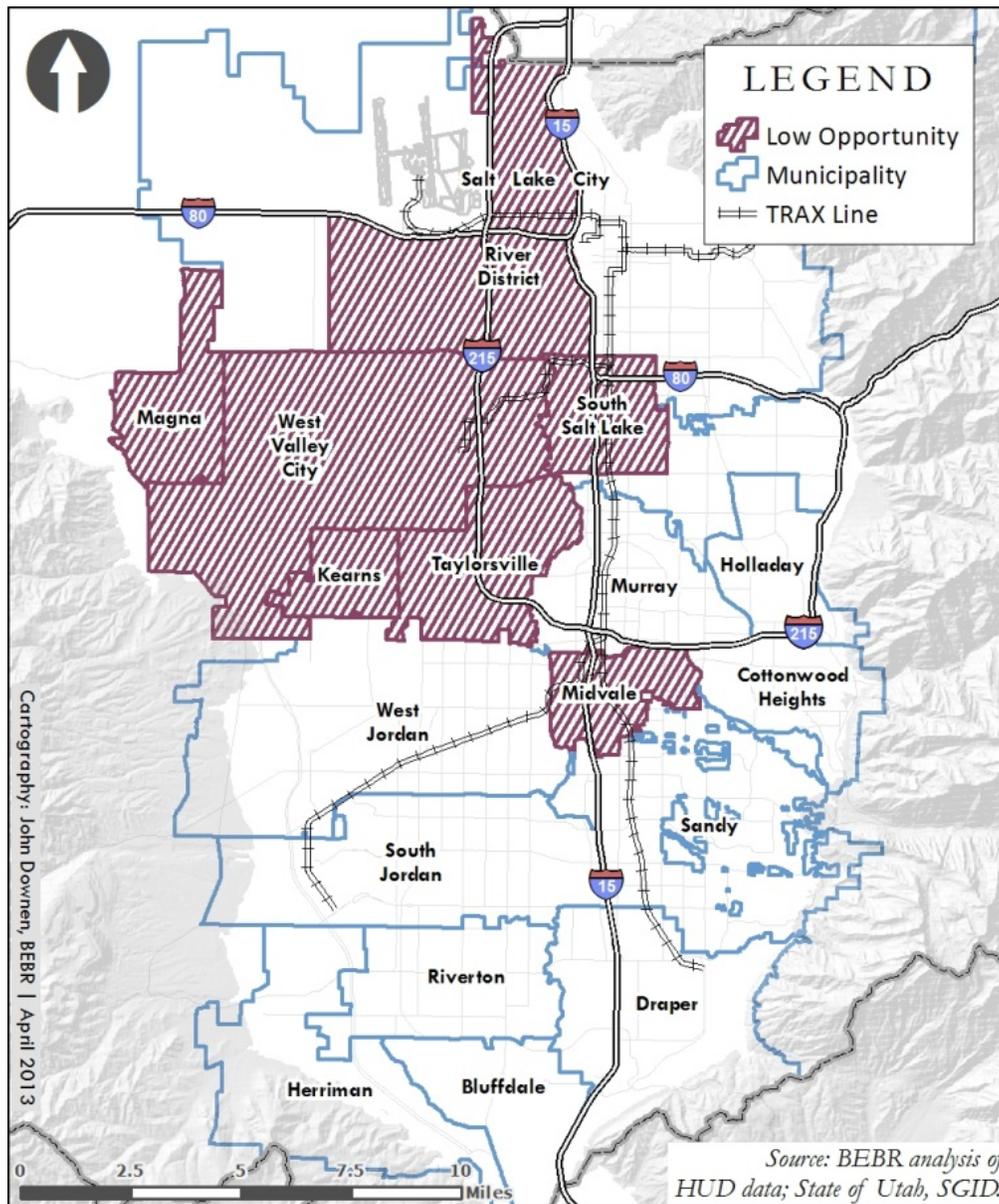
Table 1
Major FHEA Attributes of Fifteen Cities in Salt Lake County

	Minority Population 2010	% Chg Minority Population 2000-2010	Percent of Individuals in Poverty	Opportunity Index (1 very low 10 very high)	% of Affordable Housing Needs Met*
Entitlement Cities					
Salt Lake City	64,115	20.1	16.6	4.9	130%
Sandy City	12,201	54.5	5.7	7.0	39%
South Jordan	6,031	229.4	1.6	8.0	3%
Taylorsville	17,112	48.3	9.5	3.3	40%
West Jordan	26,352	147.5	5.6	4.5	21%
West Valley City	59,982	85.4	10.7	2.0	62%
Non-Entitlement Cities					
Bluffdale	542	149.8	4.7	3.0	28%
Cottonwood Heights	3,957	76.1	5.3	7.5	15%
Draper	5,792	107.5	4.9	7.7	5%
Herriman	2,266	2,415	1.7	6.0	
Holladay	2,852	249.0	6.0	7.3	35%
Midvale	8,858	23.3	17.7	3.1	82%
Murray	7,575	79.5	7.7	5.9	59%
Riverton	3,737	184.0	3.8	5.7	6%
South Salt Lake	6,031	35.9	18.3	1.5	196%
Salt Lake County					
Salt Lake County	267,770	56.4	9.4	4.9	Na

*Rental housing needs met for renters with incomes from 30% to 50% AMI.
Source: U.S. Census Bureau and HUD.

The results of the FHEA identify five low opportunity cities; Salt Lake City (River District), South Salt Lake, Midvale, Taylorsville, and West Valley City as well as two low opportunity neighborhoods in unincorporated Salt Lake County; Magna and Kearns *Figure 1*. Within these cities and neighborhoods opportunity and equity are at risk.

Figure 1
 Low Opportunity Cities and Neighborhoods in Salt Lake County



Background: Demographic Change Through a Fair Housing Lens

HUD requires that the FHEA include an overview of recent demographic changes in the protected classes. While essentially descriptive this section provides the demographic context and dynamics that underlie opportunity and equity.

Minority and Hispanic Population

From 2000 to 2010 the population of Salt Lake County increased by 15 percent however, the county’s minority population grew by 56 percent; an increase of 96,500 individuals. Three quarters of the population growth in Salt Lake County in the past ten years is due to the increase in the county’s minority population.

The minority population in Salt Lake County in 2010 was 267,770; accounting for 26 percent of the population of the county. The five cities with the highest concentration of minority populations are: West Valley City 46.3 percent minority, South Salt Lake 43.5 percent, Salt Lake City 34.4 percent, Midvale 31.7 percent, and Taylorsville 29.2 percent. Bluffdale has the lowest share of minority individuals at 7.1 percent.

The largest minority population group is Hispanic. The Hispanic population increased at a faster rate than the minority population. From 2000 to 2010 the Hispanic population in the county increased by 69,228 individuals, an increase of 64.8 percent. During this decade the Hispanic population increased from 11.9 percent of the county's population to 17.1 percent.

The Hispanic population in the county in 2010 was 176,015, representing two-thirds of all minority individuals. The five cities with the highest concentration of Hispanic population are: West Valley City 33.1 percent Hispanic, South Salt Lake 29.1 percent, Midvale 24.3 percent, Salt Lake City 22.3 percent and Taylorsville 18.6 percent. Bluffdale has the lowest share of Hispanic individuals at 4.4 percent.

Disabled Individuals

The Bureau of the Census has published reliable estimates on disabled individuals in Salt Lake County for 2010. Unfortunately these estimates cannot be compared to the 2000 Census estimates due to significant changes in definitions of disabilities. The 2010 definitions are narrower in scope resulting in a decrease in the number of disabled individuals. The change in definitions produces lower but more accurate estimates of the disabled population.

In 2010, 8 percent of the Salt Lake County population meets the definition of disabled; an estimated 83,600 unique individuals. Many disabled individuals suffer from more than one disability. The number of individuals with ambulatory difficulty was 38,350, with self-care limitations 15,050, independent living difficulty 27,675, and cognitive difficulty 33,650. Seniors (65 years and more) comprise 37 percent of the disabled population.

A sizeable share—an estimated 80 percent—of disabled individuals live in households where householder is a homeowner. Unfortunately these individuals are less likely to have accessible units since the Fair Housing Act (FHA) does not apply to owner-occupied dwelling units. Visitability and accessibility for such individuals can only be improved through changes in local building codes, education and awareness of home builders and home buyers.

In many cases the FHA does apply to the construction of rental units therefore the act plus local housing policy and practices can more effectively address the visitability and accessibility needs of renters. There are an estimated 5,600 ambulatory disabled renters in the county. For most of these individuals the FHA accessibility standards would likely be sufficient. However, for those that require Type A accessibility, due primarily to use of a wheelchair, demand exceeds supply.

Since 1991 about 7,400 apartments units built in Salt Lake County should have met FHA standards. The number of rental units meeting the higher Type A standard—suitable for wheelchair accessibility—is estimated at less than 50 units in large market rates projects and 235 units in federally assisted rental projects.

National data indicate that about 0.006 percent of the population requires a wheelchair. Applying this percent to the number of persons living in rental units in Salt Lake County in 2010 (295,000 persons) about 1,800 would require a wheelchair. Since 2003 the number of Type A accessible units built probably does not exceed 300 units, (50 units in market rate projects and 235 units in federally assisted units) far short of the estimated need of 1,800 units. Furthermore, for those renters requiring wheelchair accessible units supply is largely confined to those communities where new tax credit projects have been built. Half of all Type A accessible units in federally assisted projects are in Salt Lake City. Fair housing choice for disabled renters requiring the use of a wheelchair is limited.

HUD has provided some estimates, at the national level, of the nonelderly renter households with disabled individuals. Using the national ratio it is estimated that about 11,100 households in Salt Lake County are renter households with a disabled individual.

HUD has also provided some recent estimates on disabled individuals with “worst case housing needs.” This group is defined by HUD as those renter households with disabled individual(s) receiving no housing assistance, very low-income (less than 50 percent AMI), and severe cost burdens (paying more than 50 percent of income for housing). The estimated number of “worst case housing needs” individuals is 2,800. Sixty percent of these individuals have ambulatory difficulty. The second largest disability category for this group is cognitive difficulty.

The need for accessible housing units far exceeds the demand due in large part to the lack of any accessibility standards for detached single-family homes. In addition renter households with disabled individuals that need Type A accessibility standards and/or have “worst case housing needs” the supply of accessible, affordable units falls far short of demand.

Family Status

Another protected class is familial status, which refers to a group that includes pregnant women, children living with their parents, and legal custodians of children. While the language about familial status discrimination is clear, the guidelines landlords can use to establish occupancy are notoriously vague and for most communities nonexistent. Although landlords can create occupancy guidelines based on the physical limitations of the housing unit landlords often impose strict occupancy limitations precluding large families with children.

Nationally HUD data show that familial status discrimination ranks third in discrimination of protected classes, behind discrimination due to race and disability. The local complaint data from Utah’s office of Antidiscrimination and Labor shows familial status ranks second in frequency behind complaints based on disabilities. Twenty-five percent of complaints to local HUD office and Utah’s Antidiscrimination & Labor Division over the past five years have been based on familial status.

Male and female householders with no spouse present but children under 18 years of age represent 8.6 percent of all households in Salt Lake County. These single parents are vulnerable to discrimination due to socioeconomic characteristics associated with this group. Interestingly, single parent households with children have grown at a slower rate than many other household types over the past ten years.

In absolute terms the number of single females with children under 18 years of age has increased by 2,342 during the 2000 to 2010 period. In 2010 there were 20,666 single female households with

children under 18 years of age, 6 percent of all households. The total number (male or female) of single-parent households in 2010 in Salt Lake County was 29,624.

Segregation

The minority population in Salt Lake County is concentrated in seven areas; Kearns, Magna, Midvale, Salt Lake City's River District (neighborhoods west of I-15, east of I-215 north and south city boundaries), South Salt Lake, Taylorsville, and West Valley City. These seven areas accounted for 35 percent of the population in the county in 2010 but 58 percent of the minority population. The percent share of the county's minority population living in these seven areas is nearly unchanged over the past ten years. In 2000 the seven areas mentioned above had 59.6 percent of the minority population in the county. By 2010 their share had dropped by only 1 percent to 58.4 percent.

The concentration of the Hispanic population has also experienced little change from 2000 to 2010. Kearns, Magna, Midvale, Salt Lake City's River District, South Salt Lake, Taylorsville, and West Valley City had 64.6 percent of the county's Hispanic population in 2000 and 64.7 percent in 2010. In terms of relative share and absolute change West Valley City is the dominant city. Over the past ten years the Hispanic population in West Valley City has increased by 113.1 percent compared to 65 percent countywide; nearly twice the rate of the county. Kearns and Magna are two other areas where the Hispanic population is becoming more concentrated.

While the minority and Hispanic populations have had large absolute increases in West Valley City, Salt Lake City, and Taylorsville—cities that have traditionally had a disproportionate share of the minority population—it is important to point out that there has been some shift south in the spatial distribution of minorities in Salt Lake County; most notably in West Jordan and Sandy. West Jordan ranks second among all cities in absolute increase in minority population over the 2000 to 2010 period with an increase of 15,700 minority individuals. Sandy City ranks fifth in absolute growth of the minority population with an increase of 4,300 in the decade.

Even a slight change in the spatial distribution of minority and Hispanic populations in the county is a very positive demographic development. In relative terms several unlikely cities have seen increasing diversity, albeit for these cities the absolute numbers are still small. Nevertheless the following cities have all exceeded the countywide increase in minority population of 56 percent by a large margin: Bluffdale minority population up 150 percent, Holladay 249 percent, Riverton 184 percent and South Jordan 229 percent. The same cities also had triple digit increases in their Hispanic populations.

Access to public transportation as well as the siting of affordable housing are two factors contributing to high concentration of minority and Hispanic populations in the geographic arc running from Salt Lake City's River District south through South Salt Lake then west to West Valley City and Taylorsville.

HUD developed ratios of predicted/actual racial and ethnic concentrations. Using these ratios Riverton, South Jordan, Cottonwood Heights, and Holladay—all cities in the southern and eastern part of the county—have minority household shares that are only half the predicted shares. Nearly all the other cities in the southeastern region of the county also have below-predicted minority household shares. As expected, the cities with above predicted minority composition were Taylorsville, Midvale, Salt Lake City, South Salt Lake, and West Valley City.

While the concentrations of minority and Hispanics have persisted in Salt Lake County dissimilarity indexes show that the county has low to moderate segregation. The dissimilarity index developed by Brown University's program in Spatial Structures in Social Sciences was used to measure dissimilarity. An index number above 60 is considered high similarity and segregated. An index number of 40 to 50 is considered moderate segregation and values of 30 or below are considered low levels of segregation. The dissimilarity index numbers for the Salt Lake Metropolitan area are moderate to low for the three race categories included. Hispanics/White show moderate levels of segregation with an index estimate of 42.9 percent, Black/White is low with an index estimate of 34 and Asian/White also low with index estimate of 27. A second dissimilarity index developed by BEBR also shows the county has moderate levels of segregation.

Housing discrimination based on familial status ranks as the third most often cited discrimination complaint. The nature of these complaints generally regards large families trying to find suitable rental housing. Due to the siting of affordable rental housing these families are limited in their housing opportunities. Census data shows that nearly half of all large renter households live in Salt Lake City, West Valley City, South Salt Lake, and Taylorsville. Less than 10 percent of large families renting live in the five city area of South Jordan, Riverton, Herriman, Bluffdale, and Draper. In effect, the limited opportunity of affordable rental housing for large families in the southeast and southwest sections of the county has segregated this protected class to the northwest and west mid-valley sections of the county.

Disability data show that the greatest areas of concentration of disabled persons is mid-valley Salt Lake County; including South Salt Lake, Murray, Midvale, West Valley City, Taylorsville, and unincorporated Kearns. These households have a relatively high likelihood of being low-income renters. The spatial distribution patterns of the disabled again reflect public policies regarding the siting of affordable rental housing, which tend to segregate protected classes.

Racially Concentrated Areas of Poverty (RCAP) and Ethnically Concentrated Areas of Poverty (ECAP)

Increasing concentrations of low-income and poverty households are linked to racial and ethnic segregation. "The face of poverty is also the face of segregation." And segregation impedes fair housing choice and raises the risk of housing discrimination. The consequences of poverty are particularly harmful to children. Children who grow up in densely poor neighborhoods and attend low-income schools face many barriers to academic and occupational achievement. Such children are more likely to drop out of high school and become pregnant as teenagers. Their neighborhoods have higher crime rates and higher incidence of health disparities, again affecting opportunities.

In 2010, 9.4 percent of Salt Lake County's population was poor. Approximately 6.8 percent of non-Hispanic whites were poor. Minorities were almost three times as likely to be poor with a poverty rate of 18.2 percent. In the entire county, blacks had the highest prevalence of poverty with just over 22 percent, followed by Hispanics at about 19 percent.

Though non-Hispanic whites had the lowest prevalence of poverty; they comprised about 56.2 percent of the total poor population in the county. Poor Hispanics were the second largest poor population at 32.1 percent of the total poor, and almost three quarters of the poor minority population. About 5 percent of the poor populations were Asian, and about 8 percent were black, Native American, or Pacific Islanders.

The racial and ethnic composition of the poor in the context of the county demographics illustrates the disparities in income between the minority and non-minority populations in the county—even though minorities comprised slightly over a quarter of the county’s total population in 2010, they accounted for nearly 44 percent of the total poor in the county.

The concentration of poor populations varies greatly by city. South Jordan’s 1.6 percent poverty is the lowest in the county and South Salt Lake had the highest poverty rate of any city, with over 18 percent of the population living in poverty. More than three-quarters of the poor in South Salt Lake are minorities—the highest minority share of the poor in the county.

Even within the low-income populations of Salt Lake County, patterns of racial and ethnic segregation still exist. Poor whites are more likely to live on the east and south sections of the county while poor minorities are more likely to live in the western and northern sections of the county.

HUD defines a racially/ethnically concentrated area of poverty as a census tract where the number of families in poverty is equal to or greater than 40 percent of all families, or an overall family poverty rate equal to or greater than three times the metropolitan poverty rate and a non-white population, measured at greater than 50 percent of the population. In Salt Lake County, there are three census tracts where the percent of families in poverty is three times the countywide average *Figure 2*. None of these census tracts however have a minority-majority population but these tracts are at risk of becoming RCAPs/ECAPS

The near RCAPs/ECAPs have not only a high concentration of the poor minority population but also a very high concentration of renter households. In two RCAP/ECAPs over 70 percent of households are renters.

Disparities in Opportunity

“Sustainability also means creating ‘geographies of opportunity,’ places that effectively connect people to jobs, quality public schools, and other amenities. Today too many HUD-assisted families are stuck in neighborhoods of concentrated poverty and segregation, where one’s zip code predicts poor education, employment and even health outcomes. These neighborhoods are not sustainable in their present state.” *Shawn Donovan, Secretary of Housing and Urban Development.*

HUD provided an opportunity index to quantify the important community attributes that influence the ability of an individual, or family, to access and capitalize on opportunity. HUD created five indices; school proficiency, poverty, labor market, housing stability, and job access. City level scores ranged from as low as 1.5 in South Salt Lake to as high as 8.0 in South Jordan. Based on HUD’s opportunity index there are five low opportunity, four moderate opportunity, and six high opportunity cities in the county *Table 2*.

Figure 2
Concentrations of Poverty and Minority-Majority by Tract in Salt Lake County, 2007-2011

Poverty Rate Three Times County Average

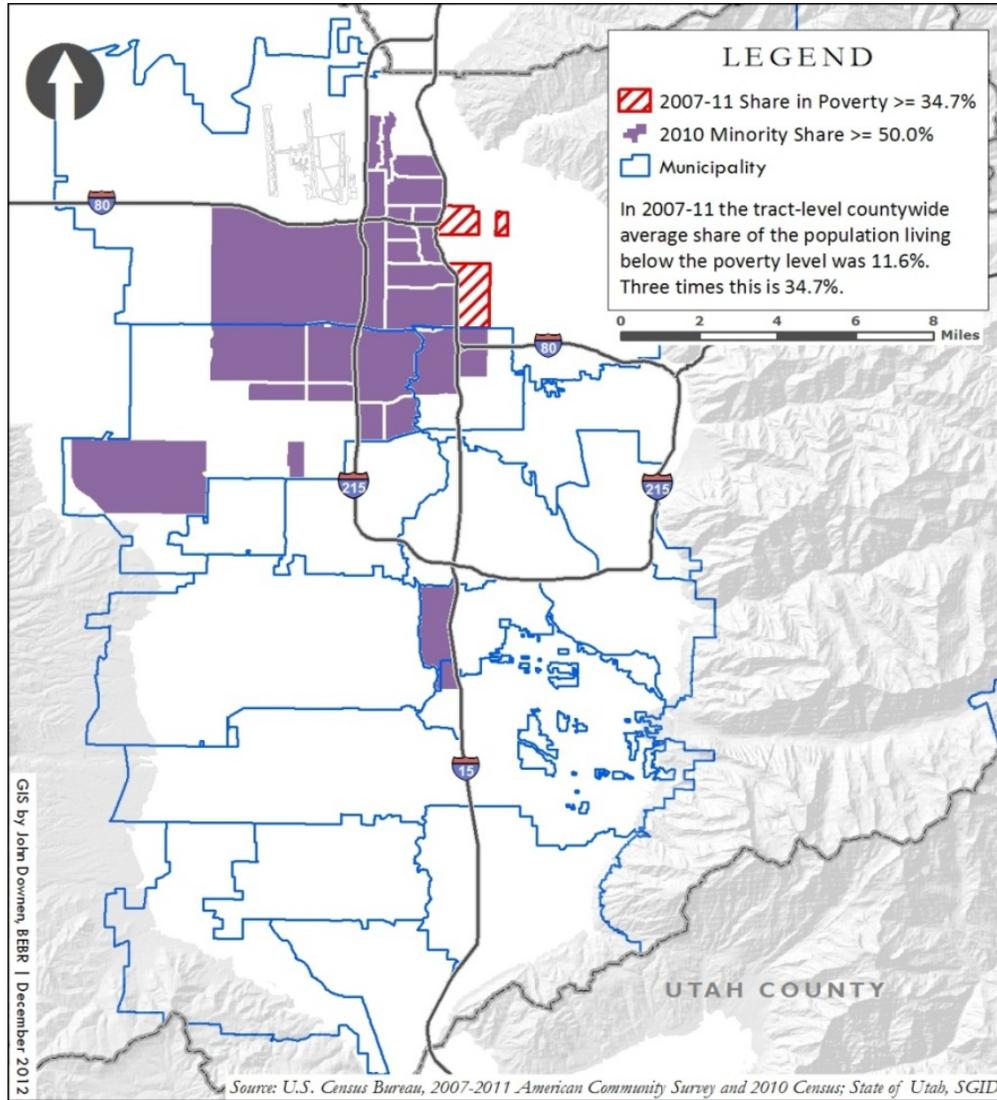


Table 2
Low and Moderate and High Opportunity Cities

Low Opportunity	Opportunity Index	Moderate Opportunity	Opportunity Index	High Opportunity	Opportunity Index
South Salt Lake	1.5	West Jordan	4.5	Herriman	6.0
West Valley City	2.0	Salt Lake City	4.9	Sandy	7.0
Bluffdale	3.0	Riverton	5.7	Holladay	7.3
Midvale	3.1	Murray	5.9	Cottonwood Heights	7.5
Taylorsville	3.3			Draper	7.7
				South Jordan	8.0

Source: HUD Spreadsheet for Sustainable Communities grantees.

The disparity in opportunity for protected classes in Salt Lake County is dramatically revealed by the share of population groups relegated to very low opportunity areas. About 30 percent of the county’s population lives in areas with the lowest opportunity index of 1-2. However, for the Hispanic population 60 percent live in very low opportunity areas while 54 percent of all minorities (including Hispanics) live in very low opportunity areas and 22 percent of whites (non-Hispanic). Less than 5 percent of Hispanics live in high opportunity areas *Table 3*.

Table 3
Opportunity by Population Group

Opportunity Index Score	Total Population		Hispanics		Minority		Non-Hispanic White	
	Number	Share	Number	Share	Number	Share	Number	Share
1–2	296,481	29.6%	93,145	60.0%	128,162	54.0%	168,319	22.1%
3–4	155,687	15.6%	24,287	15.7%	37,193	15.7%	118,494	15.5%
5–6	261,502	26.1%	23,767	15.3%	39,923	16.8%	221,579	29.1%
7–8	123,761	12.4%	6,778	4.4%	15,646	6.6%	108,115	14.2%
9–10	162,868	16.3%	7,151	4.6%	16,627	7.0%	146,241	19.2%
Totals	1,000,299	100%	155,128	100%	237,551	100%	762,748	100.0%

Source: HUD Spreadsheet for Sustainable Communities Grantees.

In addition to the HUD developed opportunity index BEBR has weighed a number of measures of opportunity by city to further explore access and barriers to opportunity. These measures include location of child care facilities, food deserts, medically underserved areas/populations, crime rates, quality of housing stock, housing affordability, and public school characteristics.

Child care facilities – The spatial distribution of facilities appears to modestly favor east side neighborhoods. There are no pronounced gaps in availability of services, however cost data are not available and are a critical component of accessibility.

Food deserts – Using the USDA’s *Food Access Research Atlas* food deserts in Salt Lake County were identified. A food desert is defined by income, accessibility, and vehicle ownership. Possible food deserts were identified in South Salt Lake and the neighborhoods of Rose Park, Fair Park and Poplar Grove in Salt Lake City.

Medically Underserved Areas/Population – The U.S. Department of Health and Human Services has designated underserved areas. In Salt Lake County they include: west side Salt Lake City, South Salt Lake, Taylorsville, Midvale, West Valley City, Magna, and Kearns.

Crime Rates – The cities with the highest crime rates in the county are: Salt Lake City, South Salt Lake, Murray, West Valley City, and Taylorsville.

Deteriorating Quality of Housing Inventory – Homes that are greater than fifty years old and have a value of less than \$150,000 have a much higher likelihood of deferred maintenance, deteriorating quality and high energy costs. The neighborhoods most at risk of deteriorating quality are in Salt Lake City’s River District especially, Rose Park, Poplar Grove, and Glendale. The other two high risk neighborhoods are Kearns and Magna.

Diversity of Home Values and Affordability – Housing price diversity in several cities is limited in Salt Lake County, restricting access to opportunity for potential homeowners. Some cities on the county’s west side—West Valley City and Taylorsville—have relatively few

opportunities for families seeking homes valued above \$300,000 while many southeast, southwest, and east side cities have little housing opportunities for moderate to low-income families.

Educational Opportunity - For the children of any neighborhood the most important factor shaping lifetime opportunities is the quality of the local schools. Educational opportunity varies significantly throughout the public schools across the county often leading to decisive disparities in educational opportunity. The impact of these disparities falls heaviest on the children of protected classes. These disparities have long-term consequences. Most obvious is lower levels of educational attainment, which in turn affects future earnings trapping individuals, families, and entire communities in a generational cycle of poverty. Due to the strong link between education and opportunity, considerable discussion and numerous measures were used, in the body of the study, to evaluate those factors affecting student achievement and school performance.

School Opportunity Index by City – Independent of the HUD index BEBR developed a school opportunity index by city. The index used two positive dimensions: percent proficiency in language arts and percent proficiency in science for elementary, middle, and high schools and four negative dimensions (proxies for home environment and educational quality): the percent of students eligible for free and reduced lunch, percent of minority students, percent of students with parents with limited English proficiency (LEP), and average classroom size. Draper, South Jordan, and Herriman scored the highest on the index while South Salt Lake, west side Salt Lake City, and West Valley City scored the lowest *Table 4*.

Table 4
School Opportunity Index by City, 2011
(Index 1=poor, 10=excellent)

City	Index
Draper	9.0
South Jordan	8.9
Herriman	8.4
Riverton	8.3
Holladay	7.9
Cottonwood Heights	7.7
Sandy	7.7
Bluffdale	7.0
Murray	6.6
East Side Salt Lake City	6.3
West Jordan	5.4
Salt Lake City	4.2
Taylorsville	4.2
Midvale	3.7
West Valley City	2.5
West Side Salt Lake City	1.9
South Salt Lake	1.0

Source: Bureau of Economic and Business Research, University of Utah

Minority, Low-Income Schools – Consistently the same four or five cities in Salt Lake County are disproportionately affected by growing concentrations of minorities. For some

public schools this has led to very high percentages of enrollment of minority students, primarily Hispanic students. The increasing proportion of children with non-English backgrounds can put an extra burden on a school’s administration, teachers, and resources. Difficulty with English may impede proficiency in academic subjects, hurting both student and school achievement. Not only is there a heavy concentration of minority students in the Salt Lake City, South Salt Lake, West Valley City, Kearns, and Magna schools but, a substantial share of these minority students are members of low-income or poor households, which intensifies the challenge and raises the risk that a school’s socioeconomic background may limit educational opportunities. For example high minority, high poverty schools may have a “dilution of the curriculum” to accommodate low achieving students accompanied with diminished teacher expectations; a potentially damaging consequence of high concentrations of low-income, minority households.

Many studies have shown that high rates of poverty are detrimental to school and student achievement. Students from poor households have much higher educational risks and when assigned to a high poverty school the risks and disadvantages are compounded. High concentrations of school poverty are a threat to a student’s educational, social, and, ultimately, employment opportunities. When a school’s student body becomes 50 percent poor, classroom achievement declines; at 75 percent poor achievement is seriously threatened. Income inequality is the driving force in disparities of educational opportunity nationally and locally.

Affordable Housing Need

The need for affordable housing in Salt Lake County is substantial. Below the deficit/surplus of affordable housing for renters with income levels from 30% to 50% AMI is shown *Table 5*. Sandy City has the largest deficit of 2,908 units however, in Salt Lake City and South Salt Lake there is a surplus of affordable units. In both cities this is due to a large number of affordable apartment units.

Table 5
Deficit/Surplus of Affordable Rental Units in Salt Lake County
County Deficit 16,000 Units
 (Renter Income Level – 30% to 50% AMI)

City	Deficit/Surplus	City	Deficit/Surplus
Bluffdale	-157	Salt Lake City	2,762
Cottonwood Hts	-1,211	Sandy City	-2,908
Draper	-1,220	South Jordan	-1,376
Herriman	-522	South Salt Lake	914
Holladay	-762	Taylorsville	-1,370
Midvale	-236	West Jordan	-2,263
Murray	-874	West Valley City	-1,668
Riverton	-869		

Source: HUD Spreadsheet for Sustainable Community Grantees.

PART II.
SECTION I.
DEMOGRAPHIC BACKGROUND: DEMOGRAPHIC TRENDS
OF PROTECTED CLASSES

This section provides an overview of the current demographics of Salt Lake County through a fair housing lens. This fair housing lens focuses on the demographic trends and current estimates of protected classes as defined by HUD: minorities, national origin (Hispanic), individuals of color, disabled individuals, and large family households. The purpose of the section is to provide a historical context and perspective on the current demographics of the county with particular emphasis on protected classes.

Minority and Ethnic Groups

One of the most significant factors affecting fair housing choice for protected classes is the rapid absolute increase in the minority population of Salt Lake County. This growth has put severe pressure on the supply of affordable housing, particularly affordable rental housing. In the past ten years the county's minority population increased from 171,190 to 267,770 *Table 1*. The share of minority individuals increased from one-in-five in 2000 to one-in-four in 2010. Hispanics comprise two-thirds of the minority population. In the past ten years the population increase among minorities accounts for nearly 75 percent of the county's increase in population of 131,000.

A comparison of population growth in the county over the two most recent decades however shows a significant drop in population growth rates in recent years *Table 2*. From 1990 to 2000 the population of the county increased by 24 percent but in the following decade the growth dropped to 14 percent. This is also true for the minority population. In the most recent decade the minority population increased by 56 percent compared to 130 percent during the 1990-2000 period. However, in *absolute* terms the increases in the two decades were comparable; the minority population increased by 96,500 in the 1990s and by 96,700 in the 2000s. Not surprisingly the demographic trend for the Hispanic population, which is the largest minority population, is similar to the trend for the overall minority population; i.e. recent decline in rates of growth but still large absolute increases.

The minority population includes all races and ethnic groups, i.e. all race and ethnic groups with the exception of the category "white alone, not Hispanic or Latino".

Table 1
Demographic Trends for Protected Classes in Salt Lake County, 1990 - 2010

	1990		2000		2010	
	Count	Share	Count	Share	Count	Share
Total Population	725,956		898,387		1,029,655	
White (not Hispanic)	651,565	89.8%	727,197	80.9%	761,885	74.0%
Minority	74,391	10.2%	171,190	19.1%	267,770	26.0%
Hispanic/Latino	43,647	6.0%	106,787	11.9%	176,015	17.1%
Non-Hispanic Minority	30,744	4.2%	64,403	7.2%	91,755	8.9%
American Indian	5,458	0.8%	6,487	0.7%	6,565	0.6%
Asian or Pacific Islander	19,586	2.7%	33,581	3.7%	48,897	4.7%
Asian ¹	14,637	2.0%	22,716	2.5%	33,454	3.2%
Pacific Islander ¹	5,398	0.7%	10,865	1.2%	15,443	1.5%
Black (not Hispanic)	5,205	0.7%	8,501	0.9%	14,622	1.4%
Other Race	495	0.1%	912	0.1%	1,960	0.2%
Two or More Races ²	—	—	14,922	1.7%	19,711	1.9%
Persons with Disabilities ³	—	—	131,045	16.2%	86,989	9.3%
			± 1,706	± 0.2%	± 2,436	± 0.3%
Total Households	540		1,112		1,966	
Households with Children under 18	333	61.7%	725	65.2%	1,137	57.8%
Households with Persons over 65	89	16.5%	148	13.3%	276	14.0%
Single Parent with Children under 18	29	5.4%	42	3.8%	152	7.7%
Large Families (5 or more persons)	184	34.1%	456	41.0%	641	32.6%
Owner-occupied Housing Units	458	84.8%	1,031	92.7%	1,598	81.3%
Renter-occupied Housing Units	82	15.2%	81	7.3%	368	18.7%

¹ Since the 1990 Census tabulated Asians and Pacific Islanders as one category, the 1990 Asian and Pacific Islander populations are derived by summing the individual races listed in the 1990 Summary Tape File 1A. This derivation includes Hispanics and non-Hispanics, so the sum of the Asian and Pacific Islander populations is slightly larger than the aggregated Asian or Pacific Islander category, which includes only non-Hispanics. The reported Asian and Pacific Islander populations for 2000 and 2010 are non-Hispanic.

² The 1990 Census did not have a category for multiple races.

³ The margins of error for the disability data are associated with 90% confidence intervals. Since Census 2000 did not gather disability data on the population under age 5, the 2010 data (derived from the 2009–2011 American Community Survey 3-year estimates) have been adjusted to exclude the age group under 5. Despite these age adjustments, the two data points are not comparable given changes in survey design and revisions in the definition of disability.

Source: U.S. Census Bureau

Table 2
Demographic Trends for Protected Classes in Salt Lake County, 1990 - 2010
(Absolute and Percent Change)

	1990—2000		2000—2010	
	Absolute Change	Percent Change	Absolute Change	Percent Change
Total Population	172,431	23.8%	131,268	14.6%
White (not Hispanic)	75,632	11.6%	34,688	4.8%
Minority	96,799	130.1%	96,580	56.4%
Hispanic/Latino	63,140	144.7%	69,228	64.8%
Non-Hispanic Minority	33,659	109.5%	27,352	42.5%
American Indian	1,029	18.9%	78	1.2%
Asian or Pacific Islander	13,995	71.5%	15,316	45.6%
Asian	8,079	55.2%	10,738	47.3%
Pacific Islander	5,467	101.3%	4,578	42.1%
Black (not Hispanic)	3,296	63.3%	6,121	72.0%
Other Race	417	84.2%	1,048	114.9%
Two or More Races	—	—	4,789	32.1%
Total Households	54,461	22.6%	47,481	16.1%
Households with Children under 18	19,887	18.4%	10,172	7.9%
Households with Persons over 65	7,720	17.8%	13,593	26.6%
Single Parent with Children under 18	6,893	31.7%	6,260	21.8%
Large Families (5 or more persons)	8,694	19.3%	8,260	15.4%
Owner-Occupied Housing Units	46,844	29.9%	26,822	13.2%
Renter-Occupied Housing Units	7,617	9.1%	20,659	22.6%

Source: U.S. Census Bureau

The minority's share of population in Salt Lake County has increased from 19.1 percent in 2000 to 26 percent in 2010 *Table 3*. The Hispanic share has grown from 11.9 percent to 17.1 percent. At the city level, the minority and Hispanic populations are heavily concentrated in two cities; Salt Lake City and West Valley City *Table 4*. One-in-three residents of Salt Lake City are minority and in West Valley City nearly one-in-two are minority. Minorities have a forty-six percent share of the total population in West Valley City, the highest minority share of any city. West Valley City will very likely be the first major city in Utah to become minority majority.

These two cities account for thirty percent of the total population of the county but have nearly half of all minority and Hispanic populations. There has been a slight reduction over the past ten years in the share of minorities and Hispanics countywide living in Salt Lake City and West Valley City; their share has dropped from 50 percent to 46 percent. This decline is due primarily to the emergence of West Jordan as a minority location. In 2000, West Jordan had only six percent of the minority population in the county, but by 2010 that share had grown to ten percent. In 2010 the minority population of West Jordan accounted for 25 percent of the city's population.

Table 3
Percent Share of Population by Race and Ethnicity
Salt Lake County, 1990 - 2010

	1990	2000	2010
White Alone	93.0%	86.3%	81.2%
Black Alone	0.8%	1.1%	1.6%
American Indian Alone	0.8%	0.9%	0.9%
Asian Alone	2.0%	2.6%	3.3%
Pacific Islander Alone	0.7%	1.2%	1.5%
Other Race Alone	2.6%	5.4%	8.3%
Two or More Races		2.6%	3.1%
Total Population	100.0%	100.0%	100.0%
Hispanic Origin	6.0%	11.9%	17.1%
Minority Population	—	19.1%	26.0%

Source: U.S. Census Bureau.

Table 4
Minority and Hispanic Population by City, 2010

	Minority Count	% Minority	Hispanic Count	% Hispanic
Bluffdale	542	7.1	334	4.4
Cottonwood Heights	3,957	11.8	1,719	5.1
Draper	5,792	13.7	2,961	7
Herriman	2,266	10.4	1,358	6.2
Holladay	2,852	10.8	1,241	4.7
Midvale	8,858	31.7	6,795	24.3
Murray	7,575	16.2	4,249	9.1
Riverton	3,737	9.6	2,211	5.7
Salt Lake City	64,115	34.4	41,637	22.3
Sandy	12,201	14	6,447	7.4
South Jordan	6,031	12	3,008	6
South Salt Lake	10,273	43.5	6,869	29.1
Taylorsville	17,112	29.2	10,931	18.6
West Jordan	26,352	25.4	18,364	17.7
West Valley City	59,982	46.3	42,892	33.1

Source: U.S. Census Bureau.

From 2000 to 2010 the minority population of West Jordan increased by 15,700. In absolute terms only West Valley City, with an increase of 27,631, had a larger increase in minority population *Table 5*. A rapid increasing Hispanic population is driving minority growth in West Jordan. Three quarters of the growth in the city's minority population was due to an increase in the Hispanic population *Table 6*. In West Valley City the Hispanic population increased by 22,766 from 2000 to 2010, representing 82 percent of the growth in the city's minority population.

Table 5
Absolute and Percent Change of the Minority Population by City

	Absolute Change		Percent Change	
	1990-2000	2000-2010	1990-2000	2000-2010
Bluffdale	178	325	456.4%	149.8%
Cottonwood Heights	1,061	1,710	89.5%	76.1%
Draper	1,865	3,001	201.4%	107.5%
Herriman		2,176		2417.8%
Holladay	343	2,035	72.4%	249.1%
Midvale	4,732	1,676	193.1%	23.3%
Murray	2,089	3,356	98.1%	79.5%
Riverton	927	2,421	238.3%	184.0%
Salt Lake City	25,520	10,749	91.6%	20.1%
Sandy	4,384	4,306	124.9%	54.5%
South Jordan	1,444	4,200	373.1%	229.4%
South Salt Lake	5,871	2,711	347.2%	35.9%
Taylorsville	6,467	5,575	127.6%	48.3%
West Jordan	6,703	15,704	169.9%	147.5%
West Valley City	21,123	27,631	188.1%	85.4%

Source: U.S. Census Bureau.

Table 6
Absolute and Percent Change of the Hispanics Population by City

	Absolute Change		Percent Change	
	1990-2000	2000-2010	1990-2000	1990-2000
Bluffdale	132	177	528.0%	112.7%
Cottonwood Heights	198	873	30.6%	103.2%
Draper	912	1,492	163.7%	101.6%
Herriman		1,316		3,133.3%
Holladay	30	969	12.4%	356.3%
Midvale	3,795	1,182	208.7%	21.1%
Murray	1,224	1,700	92.4%	66.7%
Riverton	478	1,418	151.7%	178.8%
Salt Lake City	18,746	7,383	120.9%	21.6%
Sandy	1,969	2,572	103.3%	66.4%
South Jordan	710	2,046	281.7%	212.7%
South Salt Lake	3,951	1,937	402.8%	39.3%
Taylorsville	4,104	3,909	140.6%	55.7%
West Jordan	4,098	11,482	147.2%	166.8%
West Valley City	13,914	22,766	224.0%	113.1%

Source: U.S. Census Bureau.

Disabled Individuals

The disabled, a protected class, are much more difficult to quantify than the minority or ethnic populations. There are many definitions of disability. The U.S. Census Bureau, Social Security Administration, American Disabilities Act (ADA), World Health Organization, and HUD have all developed disability definitions. The U.S. Census Bureau definition is the most lenient. HUD uses the definitions developed in the ADA. This definition uses more stringent and specific criteria for

defining a disability. Since the ADA aims to determine those individuals that require workplace and public accessibility in accommodations, standards for defining a disability must be specific and easily interpreted. The number of definitions for disability reflects the difficulty in determining the size of the disabled population. Another complicating factor is that many individuals suffer from two or more disabilities, particularly the frail elderly.

Disabled renters are emphasized in this section because housing policy, programs, and ordinances can address renter problems via the ADA. The amended ADA requires some standards of accessibility for multifamily projects with more than 4 units. Exemptions from accessibility standards were given to owner-occupied buildings with no more than four units, single-family homes sold or rented without the use of a broker (see discussion below of accessibility standards).

The U.S. Census Bureau is the only agency or organization to estimate disabled persons at the city and county level. The most recent Census estimates are provided in the American Community Survey 2010 (one-year estimates). These data show that in Salt Lake County in 2010 about 8 percent of the population met the Census definition of disability *Table 7*. Unfortunately, comparison to the 2000 Census is not possible due to a change in definitions by the Census in 2008. Additionally, the 2010 spatial patterns of the disabled cannot be mapped because block and census tract data have significant margins of error rendering small area data useless.

Table 7
Estimates of Individuals with Disability in Salt Lake County, 2010

	Range of Disabled Individuals	% of Population
Disabled Individuals	79,600–87,600	7.8%–8.6%
Ambulatory Difficulty	33,825–42,850	3.3%–4.2%
Self-Care Limitations	12,100–18,000	1.2%–1.8%
Independent Living Difficulty	24,300–31,050	2.4%–3.0%
Cognitive Difficulty	28,900–38,400	2.8%–3.8%
Seniors as Percent of Disabled	37%	—

Source: U.S. Census Bureau, ACS 1-year estimates for 2010 Table S1810.

Table 8
Salt Lake County: Estimates of Nonelderly Renter Households with Disabled Individual, 2010

	All Nonelderly Renters	Renter Households with Disabled Person	Individuals with Cognitive Difficulty	Individuals with Ambulatory Difficulty
Renter Households	101,066	11,096	5,148	5,602
Unassisted w/severe problems	23,085	3,024		
Assisted	13,908	2,927		
Very Low-Income	48,877	7,378		
Worst Case Needs	20,258	2,818	1,345	1,665

Source: Derived from *Worst Case Housing Needs of People with Disabilities 2009*, HUD.

Due to limited local information regarding the disabled a national study was used to help derive local estimates. In 2011 HUD’s Office of Policy Development and Research presented a study to Congress analyzing housing and the disabled. This study titled *2009 Worst Case Housing Needs of People with Disabilities* provides data nationally on nonelderly disabled renters. Using national ratios from this study—the authors note in the study that geography did not have much effect on the *incidence*

(not location) of nonelderly disability—estimates of nonelderly renter disability for Salt Lake County were developed. The estimated number of nonelderly renter households in Salt Lake County in 2010 was 101,000 *Table 8*.

Eleven percent of these households had a disabled individual. A disabled renter has a high likelihood of being poor. Two-thirds of all disabled renters are very low-income (\leq 50% AMI) households. About 3,000 of these nonelderly renter households with disabled individuals received no housing assistance and had severe housing problems (housing cost burden above 50 percent and/or overcrowding). And finally HUD developed a category called “worst case needs.” These households were defined as those households that were very low-income, had no housing assistance, had severe cost burdens, and/or overcrowding and had a disabled person. Assuming that the number of disabled renters is increasing at the same growth rate as the renter population, 2.6 percent yearly, the annual growth in the nonelderly disabled renter groups would be: 300 additional disabled nonelderly renters, which includes 200 very low-income disabled renters and 75 “worst case needs” renters.

The number of accessible rental units in Salt Lake County is unknown. The need for accessible units has been unclear for years. Advocates for the disabled have much anecdotal information of need and lack of accessible units while developers of multifamily units who are required to provide some accessible units maintain they have trouble renting such units.

A rough estimate of the number of accessible rental units can be derived from new apartment construction activity. Since 1991, under the amended Fair Housing Act every unit in multifamily projects with an elevator and four or more units must meet accessibility standards. For multifamily projects of four units or more with no elevator all units on one floor must meet accessibility standards. The Fair Housing Act’s accessibility standards are defined as:

- Accessible entrance on an accessible route.

- Accessible public and common-use areas (parking, rental office, etc.).

- Usable doors (32 inch doors and interior passage doors 31-3/4 inch).

- Accessible route into and through the dwelling unit (hallways 36 inches).

- Accessible light switches, electrical outlets, thermostats (height of switches, approach to controls).

- Reinforce walls in bathrooms.

- Usable kitchens and bathrooms (approach space to appliances 30 inches x 48 inches floor space for parallel or forward approach).

Between 1991 and 2011 there were 22,486 apartment units built in Salt Lake County with three or more units. Unfortunately the data do not break-out projects of four units or more. However dropping the project level to three units or more adds only a few additional units over the 20 year period. The 22,286 units were in a total of 1,645 buildings, hence the average size apartment building was 13.6 units. Assuming the average number of stories in the typical apartment is three stories the average number of units per floor would be 4.5 units or 33 percent of the units in a typical apartment project. Therefore, about one third of all apartment units built since 1991 in Salt Lake County have met the FHA accessibility standards; an estimated 7,400 units.

Since 2003 the International Building Code (IBC) has required that 2 percent of the units in buildings of 20 units or more meet Type A accessibility standards. These standards are stricter, requiring wheelchair turning space of 60 inches in bathrooms, specified height of counters,

bathroom fixture spacing, appliance controls, etc. Twenty unit buildings are not typical in Salt Lake County, although some projects do have 24 unit buildings. Since 2003, 9,221 apartment units have been built in Salt Lake County in 509 buildings. No more than 20 percent of these buildings would be larger than 20 units. Therefore, it is estimated that 100 buildings would have an average of 24 units or a total of 2,400 units. Two percent of these units would be required to be Type A accessible; a total of 48 units.

Additionally, any federally assisted multifamily housing projects of 5 units or more built since 2003 are required to have 5 percent of the units Type A accessible. Since 2003 the number of tax credit units built in Salt Lake County totals 4,488 units. In addition, there have been a few HUD 202 Senior projects built. Total federally assisted projects built since 2003 would be about 4,700 units. These units should include 235 Type A accessible units.

To recap; since 1991 about 7,400 apartment units built in Salt Lake County should meet FHA accessibility standards, 48 units in large market rate projects should meet Type A accessibility standards, and 235 units in federally assisted projects should meet Type A standards.

Compared to the estimated number of disabled renters in Salt Lake County of nearly 11,100 it appears that demand for accessible units far exceeds supply. However, when only the ambulatory disabled are considered the outlook improves. There are an estimated 5,600 ambulatory disabled renters in the county. For most of these individuals the FHA accessibility standards would likely be sufficient. However, for those that require Type A accessibility, due primarily to use of a wheelchair, demand exceeds supply. National data indicate that about 0.006 percent of the population requires a wheelchair. Applying this percent to the number of persons living in rental units in Salt Lake County in 2010 (295,000 persons) about 1,800 would require a wheelchair. Since 2003 the number of Type A accessible units built probably does not exceed 300 units (48 units in market rate projects and 235 units in federally assisted units) far short of the estimated need of 1,800 units. Furthermore, for those renters requiring wheelchair accessible units supply is largely confined to those communities where new tax credit projects have been built. Half of all Type A accessible units in federally assisted projects are in Salt Lake City *Table 9*. Fair housing choice for disabled renters requiring the use of a wheelchair is limited.

Table 9
Type A Accessible Units in Federally Assisted Units
(Built 2003-2011)

	Total Units	Type A Assisted
Bluffdale	168	8
Herriman	258	13
Midvale	327	16
Murray	479	24
Salt Lake	2,297	115
South Salt Lake	134	7
Taylorsville	162	8
West Jordan	377	19
West Valley City	415	21
Total	4,617	231

Source: Utah Housing Corporation.

Another important consideration regarding housing for persons with disabilities is the age structure of the population. The relatively rapid increase of elderly and frail elderly will increase the demand

for accessible rental units. In 2010 there were 27,299 households in the county with an individual 75 years or older *Table 10*. Twenty-two percent of these households were renters; a total of 6,000 households. And of these elderly renter households, 3,000 had some sort of disability. The number of elderly renters with a disability increases to 3,500 in the next five years and then expands to 4,500 by 2022. Providing fair housing choice for these households will require a broader distribution of accessible rental units.

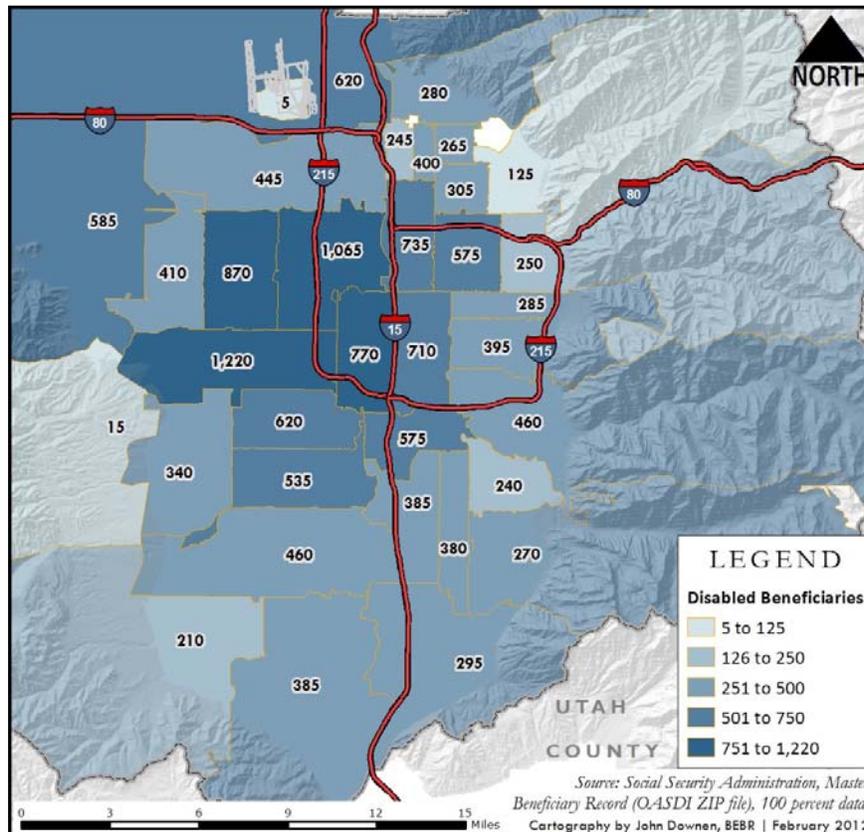
Table 10
Renter Households in Salt Lake County with Individual
75 years or Older

	2012	2017	2022
Households	27,299	31,887	40,833
Renters Households	6,006	7,015	8,983
Renters with Disability	3,003	3,508	4,492

Source: Derived by Bureau of Economic and Business Research from Demographic and Economic Analysis, Governor's Office of Planning and Budget and HUD, Worst Case Housing Needs of Persons with Disabilities.

All of the small area census information on disability is rendered useless due to high margins of error. Therefore, Social Security data on employment disability by zip code was used to provide some sense of the geographic distribution of disabled persons *Figure 1*. These data show again that the greatest areas of concentration of disabled persons is mid-valley Salt Lake County; including South Salt Lake, Murray, Midvale, West Valley City, Taylorsville, and unincorporated Kearns.

Figure 1
Person Qualifying for Social Security Disability by Zip Code



Change in Households by Familial Status

Another protected class is familial status, which refers to a group that includes pregnant women, children living with their parents, and legal custodians of children. While the language about familial status discrimination is clear, the guidelines landlords can use to establish occupancy are notoriously vague and for most communities nonexistent. Although landlords can create occupancy guidelines based on the physical limitations of the housing unit, landlords often impose strict occupancy limitations precluding large families with children. Familial status discrimination ranks third in discrimination of protected classes, behind discrimination due to race and disability. The local complaint data from Utah’s office of Antidiscrimination and Labor shows familial status is often cited as the basis for the housing complaint. In Utah familial status complaints rank second in frequency behind complaints based on disabilities. Twenty-five percent of complaints to HUD and Utah’s Antidiscrimination & Labor Division over the past five years have been based of familial status.

In 2010, there were 62,000 families in Salt Lake County with five or more persons *Table 11*. Thus nearly one in five households in Salt Lake County had five or more persons. The number of families with five or more persons exceeded 30 percent in Bluffdale, Herriman, and South Jordan; while in South Salt Lake, Murray, Midvale, Cottonwood Heights, and Salt Lake City barely one-in-ten households were large family households.

Table 11
Number of Large Families by City, 2010
(five or more persons)

	Count	% Share Of Households
Bluffdale	641	32.6%
Cottonwood Heights	1,452	11.7%
Draper	2,797	24.2%
Herriman	1,954	35.3%
Holladay	1,276	12.9%
Midvale	1,224	11.2%
Murray	2,083	11.4%
Riverton	3,240	31.0%
Salt Lake City	7,730	10.4%
Sandy	5,214	18.4%
South Jordan	4,028	28.1%
South Salt Lake	950	11.1%
Taylorsville	3,430	17.4%
West Jordan	7,746	26.0%
West Valley City	9,891	26.6%
Salt Lake County	62,057	18.1%

Source: U.S. Census Bureau.

The absolute change in large families was dominated by West Jordan and West Valley City. These two cities, which each had an increase of 2,500 large families during the decade, accounted for 60 percent of the growth in large families in Salt Lake County *Table 12*. Notably the number of large families in Sandy City has declined by over a thousand families since 2000.

Table 12
Change in Large Families by City

	Absolute Change		Percent Change	
	1990-2000	2000-2010	1990-2000	2000-2010
Bluffdale	272	185	147.8%	40.6%
Cottonwood Heights	-547	53	-28.1%	3.8%
Draper	1,140	1,258	285.7%	81.7%
Herriman		1,842		1,644.6%
Holladay	-50	485	-5.9%	61.3%
Midvale	715	-10	137.8%	-0.8%
Murray	93	405	5.9%	24.1%
Riverton	1,128	1,029	104.2%	46.5%
Salt Lake City	1,631	-87	26.4%	-1.1%
Sandy	-96	-1,045	-1.5%	-16.7%
South Jordan	1,443	1,334	115.3%	49.5%
South Salt Lake	513	116	159.8%	13.9%
Taylorsville	-193	-101	-5.2%	-2.9%
West Jordan	1,461	2,537	39.0%	48.7%
West Valley City	1,488	2,555	24.2%	29.5%
Salt Lake County	8,694	8,260	19.3%	15.4%

Source: U.S. Census Bureau.

Table 13
Renter Households by Household Size in Salt Lake County, 2010

	Minority Renters	Hispanic Renters	All Renters
Total Renters	33,359	21,005	112,203
1-person household	6,865	3,396	36,215
2-person household	6,990	3,901	29,735
3-person household	5,519	3,545	17,094
4-person household	5,404	3,900	13,431
5-person household	3,784	2,843	7,786
6-person household	2,204	1,601	4,055
7-or-more-person household	2,593	1,819	3,887
Households with 5 or more persons	8,581	6,263	15,728

Source: U.S. Census Bureau.

Table 14
Percent of Renter Households by Household Size in Salt Lake County, 2010

	Minority Renters	Hispanic Renters	All Renters
1-person household	20.6%	16.2%	32.3%
2-person household	21.0%	18.6%	26.5%
3-person household	16.5%	16.9%	15.2%
4-person household	16.2%	18.6%	12.0%
5-person household	11.3%	13.5%	6.9%
6-person household	6.6%	7.6%	3.6%
7-or-more-person household	7.8%	8.7%	3.5%
% with 5 or more persons	25.7%	29.8%	14.0%

Source: U.S. Census Bureau.

While the large family category is a significant share of households in Salt Lake County, the most important sub-category is large family households that rent. Renters are the most vulnerable to familial status discrimination. Most renter households with five or more persons will likely experience rental difficulties that impede fair housing choice. Availability of suitable structures suggests that demand exceeds supply. The American Community Survey for 2010 shows that there are about 15,350 four and five bedroom rental units in Salt Lake County but there are 15,700 renter

households with five or more persons *Tables 13 and 14*. Supply of large rental units is also likely reduced by renter households with three and four person households renting four bedroom units.

Table 15
Share of Households by Type of Households, Salt Lake County

	2000	% Share	2010	% Share
Total households	295,141	100	342,622	100.0
Family households	214,102	72.5	242,626	70.8
With own children under 18 years	118,234	40.1	124,093	36.2
Husband-wife family	170,666	57.8	187,678	54.8
With own children under 18 years	93,526	31.7	94,832	27.7
Male householder, no wife present	NA	NA	17,536	5.1
With own children under 18 years	NA	NA	8,595	2.5
Female householder, no husband present	30,648	10.4	37,412	10.9
With own children under 18 years	18,324	6.2	20,666	6.0
Nonfamily households	81,039	27.5	99,996	29.2
Householder living alone	61,366	20.8	75,064	21.9
Householder 65 years and older	18,410	6.2	28,278	6.5
Male 65 years and over	NA	NA	6,103	1.8
Female 65 years and over	NA	NA	16,072	4.7
Households with individuals under 18 years	127,961	43.4	138,133	40.3
Households with individuals 65 years and over	51,114	17.3	64,707	18.9
Average household size	3	—	2.96	—
Average family size	3.53	—	3.51	—

Source: U.S. Census Bureau.

Table 16
Change in Households by Type of Households, Salt Lake County

	Absolute Change 2000–10	Percent Change 2000–10
Total households	47,481	16.1%
Family households	28,524	13.3%
With own children under 18 years	5,859	5.0%
Husband-wife family	17,012	10.0%
With own children under 18 years	1,306	1.4%
Female householder, no husband present	6,764	22.1%
With own children under 18 years	2,342	12.8%
Nonfamily households	18,957	23.4%
Householder living alone	13,698	22.3%
Householder 65 years and older	9,868	53.6%
Households with individuals under 18 years	10,172	7.9%
Households with individuals 65 years and over	13,593	26.6%

Source: U.S. Census Bureau.

Change in Single-Parent Households - Male and female householders with no spouse present but children under 18 years of age represent 8.5 percent of all households in Salt Lake County. These single parents are also vulnerable to discrimination due to socioeconomic characteristics associated with this group. Interestingly, single parent households with children have grown at a slower rate than many other household types over the past ten years. Nevertheless, in absolute terms the number of single females with children under 18 years has increased by 2,342. In 2010 there were 20,666 single female households with children under 18, six percent of all households *Tables 15-16*. The total number (male or female) of single-parent households in 2010 in Salt Lake County was 29,624 *Table 17*. These households are concentrated west of I-15 in West Valley City, West Jordan, and Midvale. Most west side communities have many more single parents with children under 18 households than east side communities. *Figure 2* shows concentrations of single parent households

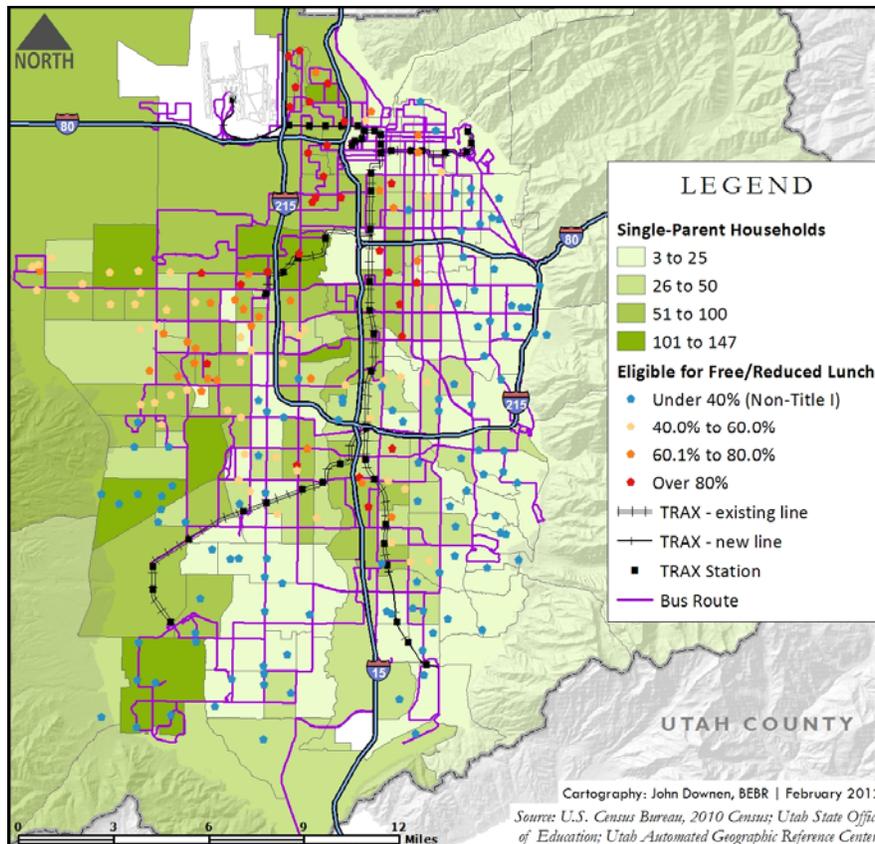
with children overlaid with the Title I status of public schools. The map shows that where non-Title One schools are prevalent there are not many single parents with children households.

Table 17
Single Parent with Children under 18 years

	Count	% Share of Households
Bluffdale	152	7.7%
Cottonwood Heights	841	6.8%
Draper	808	7.0%
Herriman	367	6.6%
Holladay	599	6.0%
Midvale	1,187	10.9%
Murray	1,547	8.5%
Riverton	702	6.7%
Salt Lake City	5,514	7.4%
Sandy	1,987	7.0%
South Jordan	760	5.3%
South Salt Lake	968	11.3%
Taylorsville	1,833	9.3%
West Jordan	3,140	10.5%
West Valley City	4,466	12.0%
Salt Lake County	29,624	8.5%

Source: U.S. Census Bureau.

Figure 2
Single-Parent Households and Title I Schools, 2010



Employment Data

In addition to demographic growth, employment trends play an important role in shaping opportunities and cultivating equity. The economic base of a community—jobs, income, and wealth—ultimately underlie the economic well-being of households and the community’s ability to provide important public services (education, transportation) crucial to equity.

Salt Lake County has long enjoyed solid levels of employment growth. Since 1990 the average annual compound growth rate for employment has been 2.2 percent *Table 18*. This above average growth rate has supported strong demographic growth and provided expanding employment opportunities for the county’s households. However, the 2001 and the 2009-2010 recessions interrupted the long-term trend as employment declined *Figure 3*. Job growth is recovering in the county with a 2.1 percent growth in 2011 and 3.6 percent in 2012.

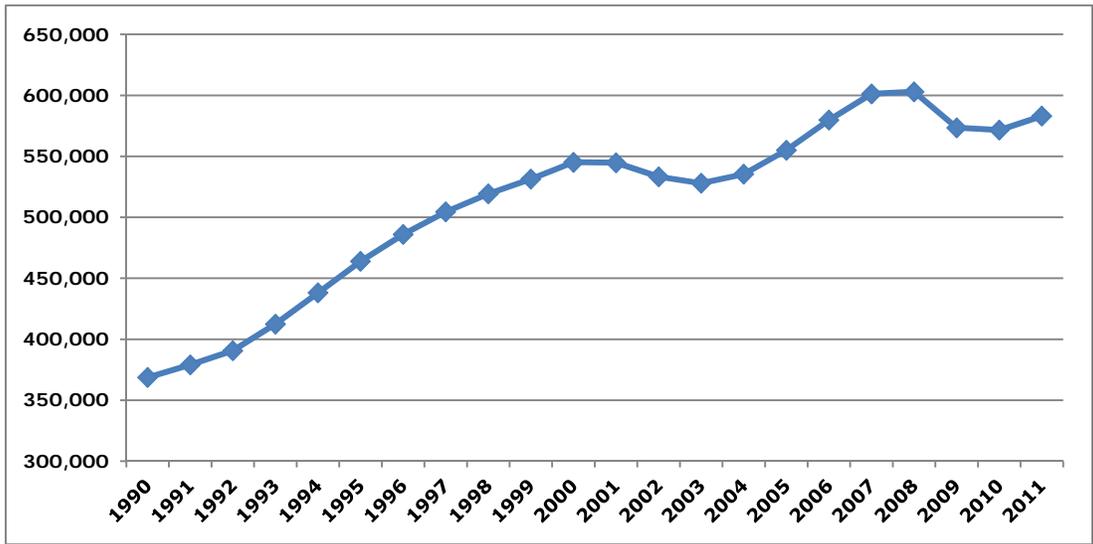
Salt Lake City is the urban core of the county and is the location for forty percent of all jobs in the county. The average annual compound growth rate for Salt Lake City is 1.5 percent. Of the remaining entitlement cities West Valley City has the largest employment base with nearly 65,000 jobs in 2011. The annual compound growth rate for West Valley City is 3.2 percent.

Table 18
Nonfarm Employment for Salt Lake County and Entitlement Cities

Year	Salt Lake County	Salt Lake City	Sandy	Taylorsville	West Jordan	West Valley City
1990	368,698	175,858	15,878	6,946	9,374	33,479
1991	379,013	174,673	16,953	8,175	9,446	36,008
1992	390,679	178,103	19,204	9,193	8,186	38,350
1993	412,458	183,000	21,669	9,752	10,752	39,157
1994	438,085	188,465	23,814	10,707	11,159	41,449
1995	463,909	195,467	25,212	11,407	11,665	45,008
1996	485,985	201,936	27,583	11,930	13,074	47,201
1997	504,458	207,180	29,541	11,774	14,020	50,164
1998	519,238	209,579	32,079	11,445	14,664	53,487
1999	531,329	214,233	33,291	12,114	15,558	52,858
2000	545,153	211,563	39,260	11,634	27,454	48,049
2001	544,714	211,742	32,539	12,595	12,929	53,614
2002	533,270	206,976	34,165	11,892	16,936	51,719
2003	527,955	196,284	35,678	11,951	17,692	54,114
2004	535,409	197,906	36,834	11,004	19,180	54,215
2005	555,055	203,983	37,197	11,593	19,153	59,521
2006	579,780	210,324	38,714	12,806	20,156	62,621
2007	601,224	243,488	42,424	17,403	28,909	63,938
2008	602,927	245,629	42,178	17,118	28,907	66,541
2009	573,449	234,499	40,415	16,698	26,237	64,386
2010	571,511	235,404	39,953	16,653	25,818	64,331
2011	583,010	239,967	40,560	17,093	26,984	64,439
2012	603,913	242,389	41,746	18,073	28,764	65,227

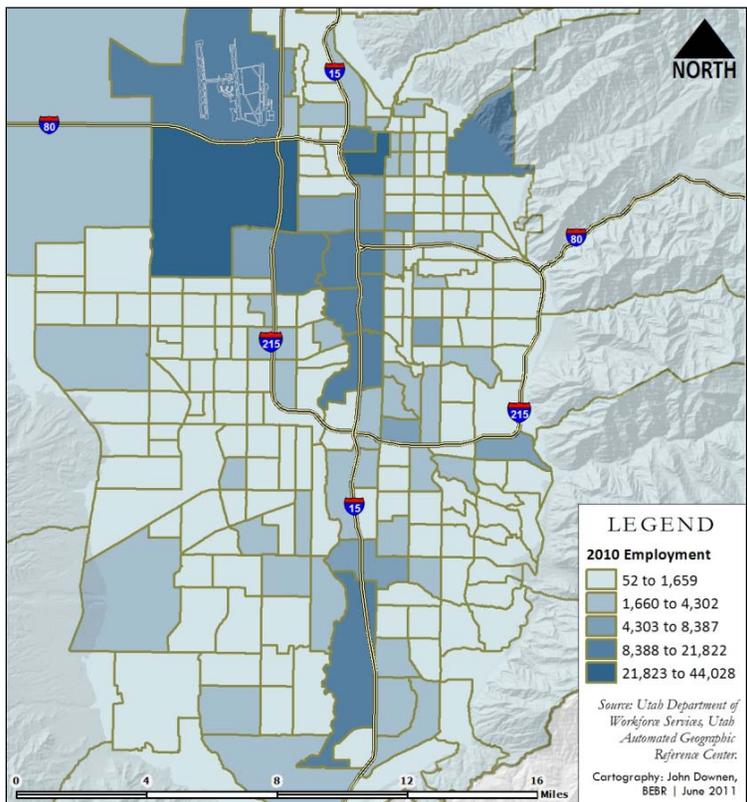
Source: Utah Department of Workforce Services.

Figure 3
Nonfarm Employment in Salt Lake County



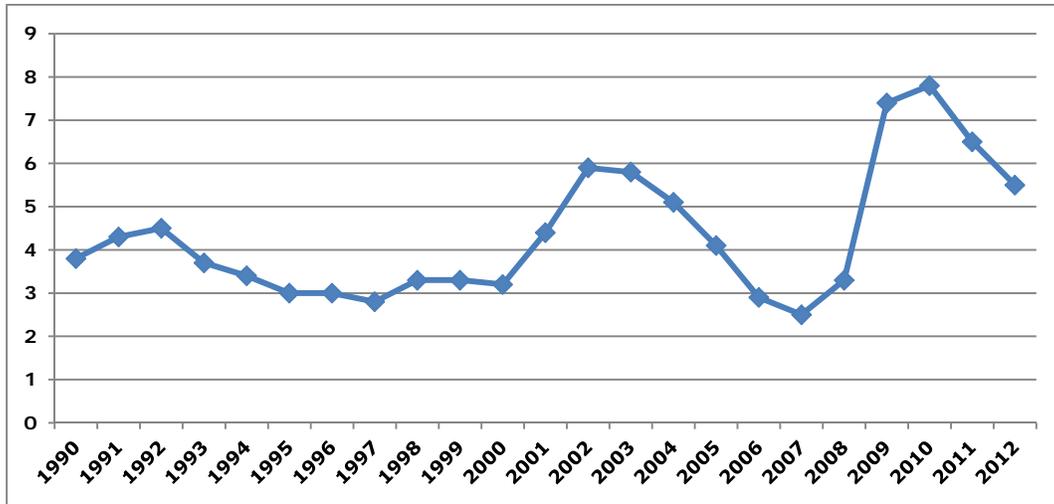
Employment centers in Salt Lake County are along I-15, the industrial sector of Salt Lake City, Salt Lake International Airport, downtown Salt Lake City, and the University of Utah *Figure 4*. These employment centers are important in the analysis in following sections with regard to jobs, housing, and transportation.

Figure 4
Employment Centers in Salt Lake County



Since 1990 the average annual unemployment rate in Salt Lake County has been 4.3 percent. In 2007 the rate dropped to its lowest recent level of 2.5 percent but, three years later reached its peak of 7.8 percent *Figure 5*. Over the past three years the unemployment rate has fallen to 4.2 percent. Historically, unemployment in Salt Lake County has been relatively low, a reflection of the high job growth conditions of the local economy. However, the impact of the two most recent recessions demonstrates that the county is not insulated from national economic trends. The high level of unemployment has had an impact on wages and income of local workers.

Figure 5
Annual Unemployment Rate in Salt Lake County



The median household income in Salt Lake County is relatively unchanged, in inflation adjusted dollars, since 1979. In fact it has declined slightly from \$57,199 in 1979 to \$56,171 in 2011 *Table 20*. Most troubling is the large drop in median income between 1999 and 2011; a drop in real terms of 15 percent, which amounts to a decline of \$10,000 for the typical household. Declining real income has affected concentrations of poverty in the county, impacted local schools, hurt student achievement and increased housing cost burdens. The consequences of declining income will be discussed in detail in subsequent sections.

Table 20
Median Household Income by Major County
(inflation adjusted dollars, 2011)

	Salt Lake	Davis	Utah	Washington	Weber
1979	\$57,199	\$64,789	\$52,537	\$41,947	\$53,686
1989	\$54,717	\$63,717	\$49,786	\$44,650	\$54,673
1999	\$66,101	\$73,416	\$62,631	\$50,850	\$60,145
2011	\$56,171	\$69,021	\$58,607	\$45,854	\$57,798
1979-2011	-1.8%	6.5%	11.6%	9.3%	7.7%
1999-2011	-15.0%	-6.0%	-6.4%	-9.8%	-3.9%

Source: U.S. Census Bureau.

SECTION II SEGREGATION

Despite the increasing diversity in Salt Lake County, the shifting demographics have only intensified the extent of segregation in the county. There are a variety of factors that can create or perpetuate segregation. Some of the most common are:

Public Policies

- Siting of housing
- Land or development cost barriers
- Zoning and land use barriers
- Local residency preferences by PHA
- Nimbyism
- Limited availability of housing choice vouchers
- Land/infrastructure availability
- Tax credit/funding availability and siting practices
- Lack of code enforcement

Other Contributors

- Local economic conditions
- Community history
- Access to transportation infrastructure
- Private actions; lending practices, steering buyers, or tenants

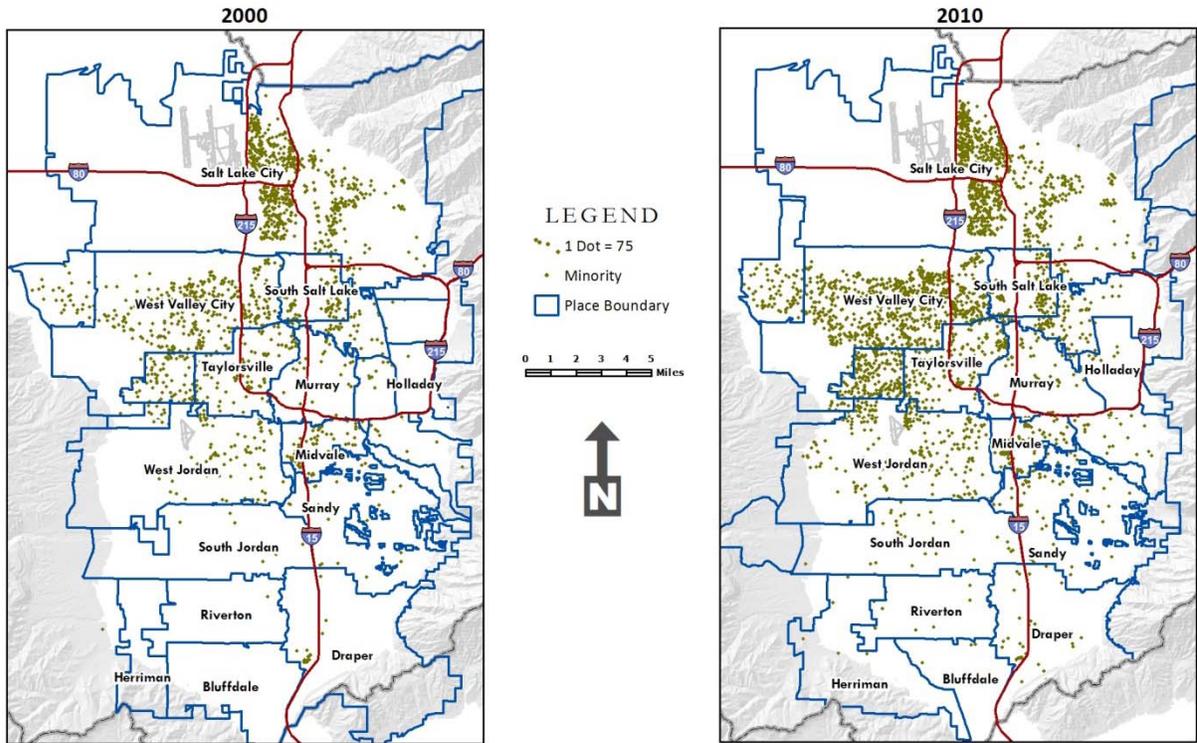
The above are driving forces behind patterns of residential development, housing affordability, and, ultimately, increasing concentrations of protected classes. This section discusses the residential patterns and trends created by the public, private, and market factors listed above. These patterns are the effects of those forces which act to limit fair housing choice. A more detailed discussion of local policies, procedures and ordinances, and private actions affecting fair housing appears in Regional Analysis of Impediments.

Increasing Concentrations of Minority Population

Since 2000, the minority population of Salt Lake County has become more heavily concentrated in the River District of Salt Lake City, South Salt Lake, West Valley City, Taylorsville, and Midvale while the sparsely populated minority areas saw little change over the decade with the exception of West Jordan and to a lesser degree Sandy City. The increasing concentration is shown in a dot density map of the minority population by census block for 2000 and 2010 *Figure 1*. The increase in minority population south of 6200 South has been very modest by comparison. Only a fraction of the 96,000 increase in minority population has spilled over to the southwest and southeast areas of the county, most notably in West Jordan.

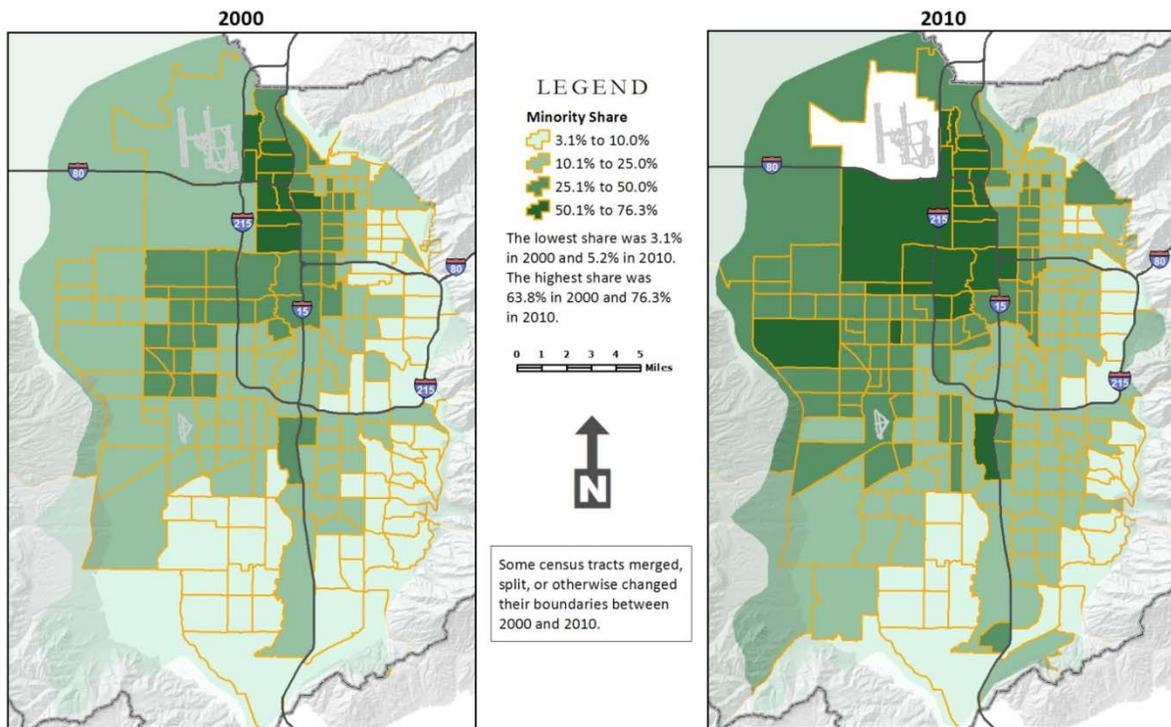
Figure 2 shows the minority shares of census tract populations in Salt Lake County for 2000 and 2010. In 2000, nearly all the minority-majority census tracts (colored coded in dark green in *Figure 2*) are in the Salt Lake City's River District. However, in 2010, several minority-majority census tracts have emerged in West Valley City and South Salt Lake as these areas became more densely populated with minorities.

Figure 1
Dot Density of Salt Lake County Minority Population by Census Block, 2000 and 2010



Source: U.S. Census Bureau, 2000 and 2010 Censuses; Utah Automated Geographic Reference Center.
 Cartography: John Downen, BEBR | June 2012

Figure 2
Minority Share of the Salt Lake County Population by Census Tract, 2000 and 2010



Source: U.S. Census Bureau, 2000 and 2010 Censuses; Utah Automated Geographic Reference Center.
 Cartography: John Downen, BEBR | June 2012

The minority population in Salt Lake County is concentrated in seven areas; Kearns, Magna, Midvale, Salt Lake City’s River District, South Salt Lake, Taylorsville, and West Valley City. These seven areas accounted for 35 percent of the population in the county in 2010 but, had 58 percent of the minority population *Table 1*. The percent share of the county’s minority population living in these seven areas is nearly unchanged over the past ten years. Therefore, there has been very little improvement in the distribution of minorities throughout Salt Lake County. In 2000, the seven areas mentioned above had 59.6 percent of the minority population in the county; by 2010 their share had dropped by only one percent to 58.4 percent.

Table 1
Change in Minority Population in Selected Areas
in Salt Lake County

	2000	2010	% Change
Salt Lake County	171,190	267,770	56.4%
Kearns	8,952	14,755	64.8%
Magna	4,422	7,873	78.0%
Midvale	7,182	8,858	23.3%
River District	30,058	37,646	25.2%
South Salt Lake	7,562	10,273	35.9%
Taylorsville	11,537	17,112	48.3%
West Valley City	32,351	59,982	85.4%
Total	102,064	156,499	53.3%
% Share of County Of Minority Pop.	59.6%	58.4%	

Source: U.S. Census Bureau.

By far the most significant city in terms of size and growth in minority population is West Valley City where the minority population increased by 85 percent in the past ten years. Forty-six percent of the population of West Valley City is minority *Figure 3*. Other areas with a large share of minorities are: the River District 66.4 percent, Kearns 55.7 percent, and South Salt Lake 43.4 percent

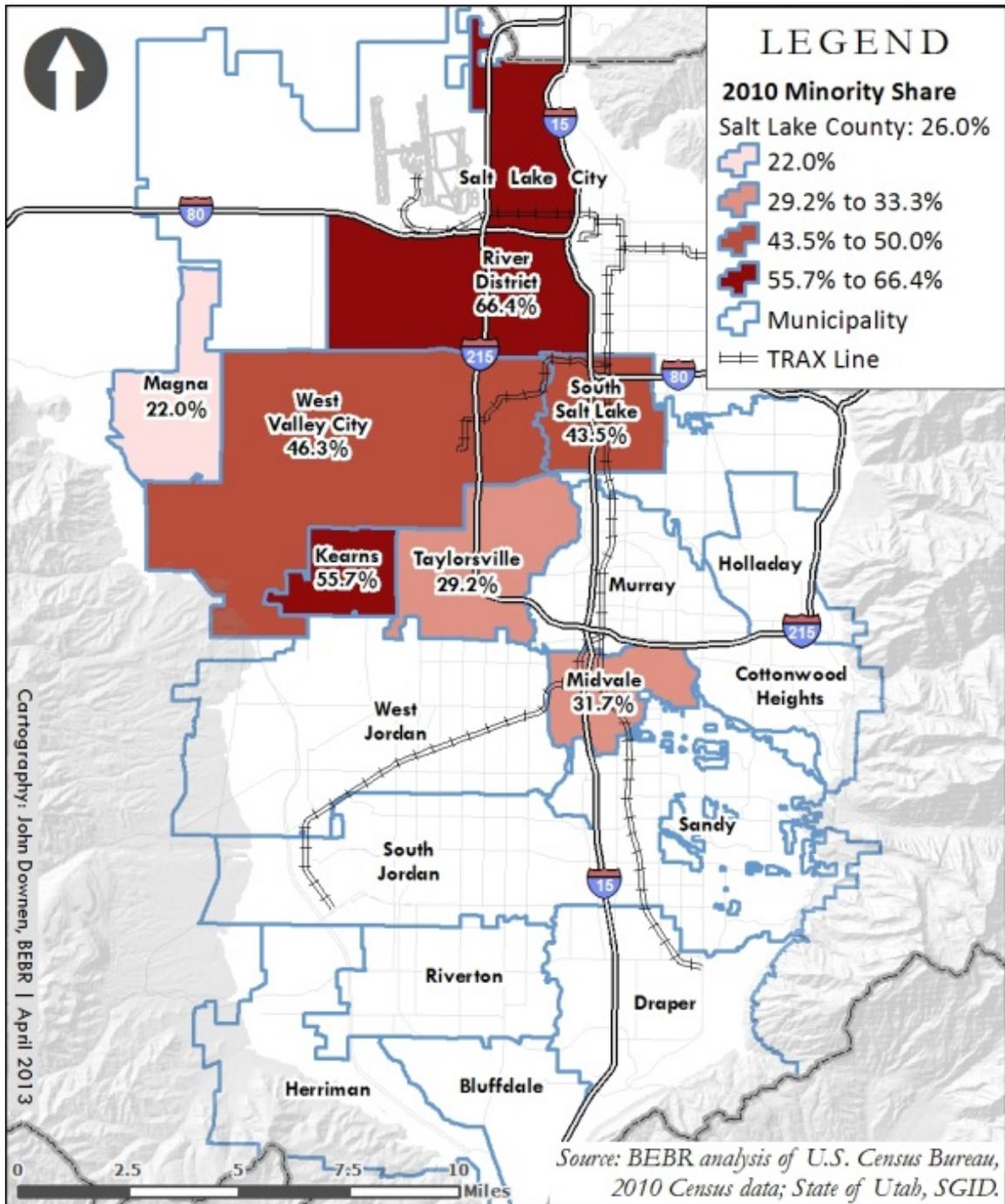
The concentration of the Hispanic population has also experienced little change from 2000 to 2010. The seven selected areas had 64.6 percent of the county’s Hispanic population in 2000 and 64.7 percent in 2010 *Table 2*. Again, in terms of percent and absolute change and percent and absolute share, West Valley City is the dominant city. Over the past ten years the Hispanic population in West Valley City has increased by 113.1 percent, compared to 65 percent countywide; nearly twice the rate of the county. Kearns and Magna are two other areas where the Hispanic population is becoming more concentrated.

Minority Households: Owners and Renters

In 2010 there were 65,800 minority households in Salt Lake County, representing nineteen percent of all households. Forty-nine percent of these minority household were homeowners and the remaining fifty-one percent were renters.

Fourteen percent of owner-occupied housing units in Salt Lake County were minority owned dwelling units, a total of 32,450 units in 2010. The number of minority owner-occupied units by census tracts in Salt Lake County is shown in *Figure 4*. As expected, most minority owner-occupied households are in the northwestern part of the county, in the River District (west Salt Lake City), West Valley City, and areas near the South Valley Regional Airport in West Jordan. Most areas in the southern and eastern regions of the county have very few minority owner-occupied households.

Figure 3
 Minority Share of Selected Areas in Salt Lake County, 2010



In the River District to West Valley City minority households accounted for 30 to 55 percent of homeowners, however minority ownership drops off rapidly to the south *Figure 4*. In general, on the east side of the county home ownership by minorities is less than 10 percent of owner-occupied units. This pattern runs from the northern county boundary to the southern boundary, east of I-15. West of I-15 homeownership by minority households extends further south with some census tracts in Taylorsville and Kearns having minority homeownership rates above 30 percent. South of 6200

South, however minority homeownership rates drop below 10 percent of owner occupied units *Figure 5*. One notable exception is the west side of Midvale, west of I-15, where the TRAX line splits with the Daybreak line running southwest. In fact, this census tract in Midvale has a minority homeownership share of nearly 58 percent.

Table 2
Change in Hispanic Population in Selected Areas
in Salt Lake County

	2000	2010	Percent Change
Salt Lake County	106,787	176,015	64.8%
Kearns	6,604	11,729	77.6%
Magna	3,416	6,188	81.1%
Midvale	5,613	6,795	21.1%
River District	21,277	28,512	34.0%
South Salt Lake	4,932	6,869	39.3%
Taylorsville	7,022	10,931	55.7%
West Valley City	20,126	42,892	113.1%
Total	68,990	113,916	65.1%
% Share of County Of Minority Pop.	64.6%	64.7%	

Source: U.S. Census Bureau.

It is clear from the patterns of homeownership that minority households are underrepresented in the east, southeast, and southwest section of Salt Lake County, and overrepresented in the West Valley City, South Salt Lake, and River District of Salt Lake City.

Figure 4
Minority Owner-Occupied Units in Salt Lake County
By Census Tract

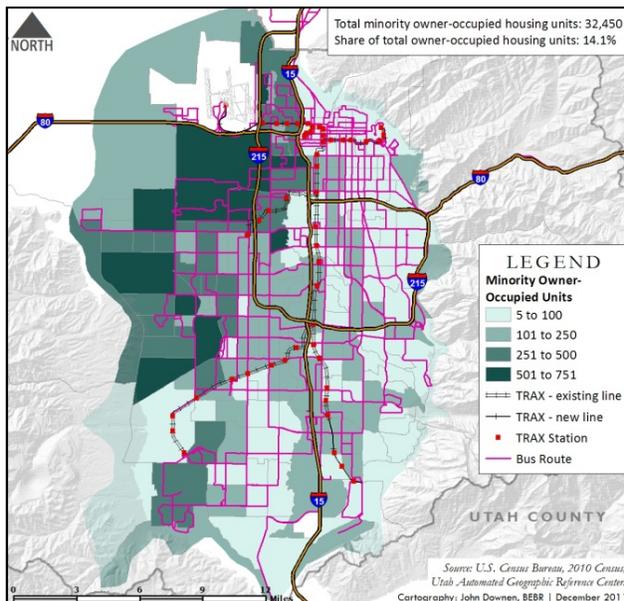


Figure 5
Minority Share of Owner-Occupied Units by
Census Tract

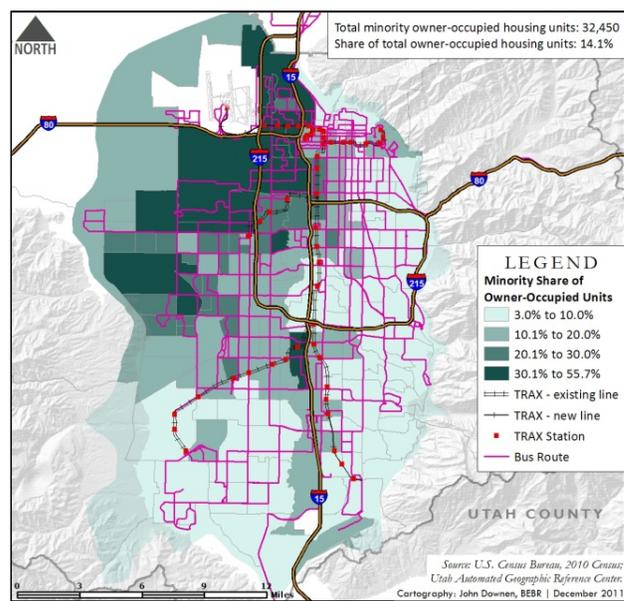


Figure 6 overlays the number of minority owner-occupied units with the density of low-wage jobs (in shades of yellow) in all areas of Salt Lake County south of Salt Lake City. Only a few pockets of low-wage employment centers exist south of Salt Lake City. These areas include parts of West Valley

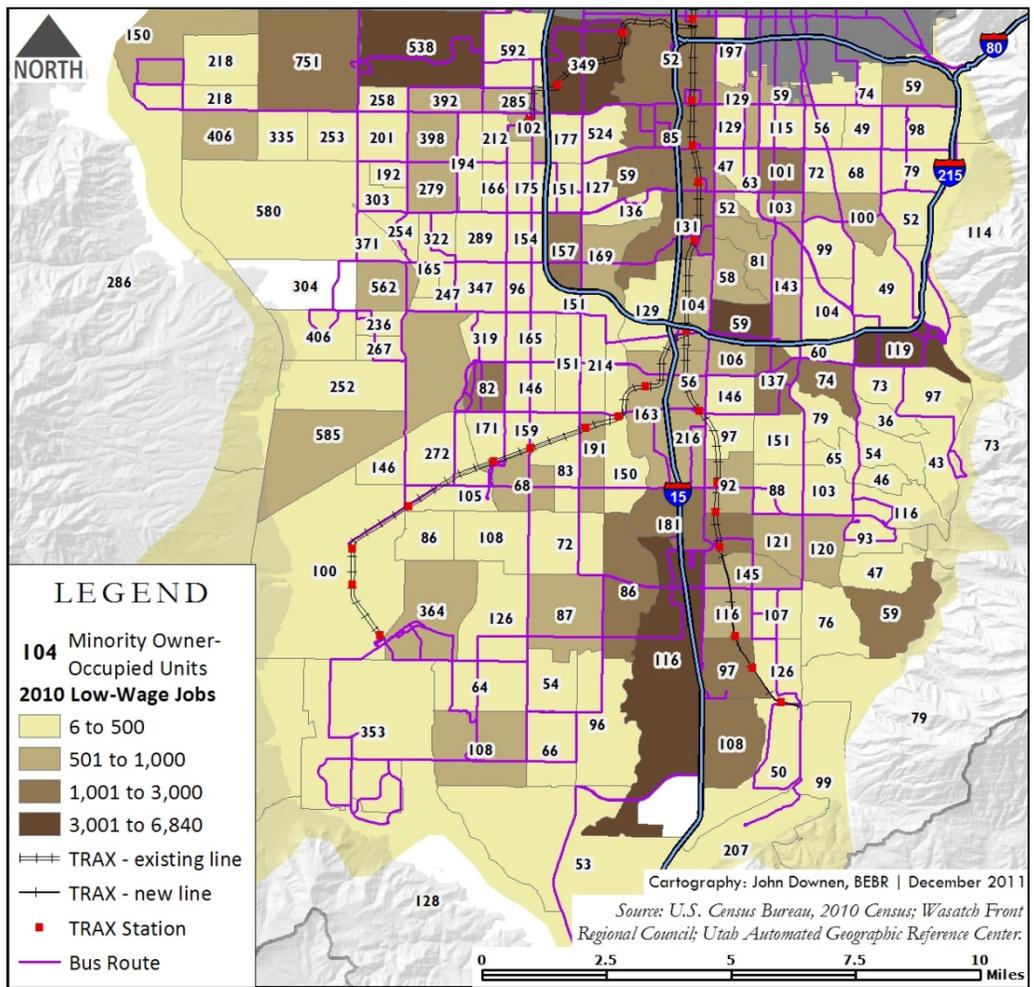
City, Murray, Cottonwood Heights, and South Jordan. Given that minority residents in Salt Lake County living outside of Salt Lake City are mostly in West Valley City and Taylorsville, the opportunities to work in Murray, Cottonwood Heights, and South Jordan are limited if the individual depends on the availability of public transit. Efficient and accommodating public transportation from residential areas west of 3600 West to employment centers such as Intermountain Medical Center (5400 South State Street), South Town Mall, and Cottonwood Mall is difficult for transit-needy, low-income individuals.

Transportation and Mobility

For those individuals living in Taylorsville and West Valley City that have automobiles, low-wage employment centers are accessible. West Valley City has a relatively large employment base—including all wage levels—of 65,000 jobs, which provides employment opportunities for the surrounding residents.

Currently, the few pockets of low-wage employment centers outside of Salt Lake City present limited transportation options for residents, especially members of the protected classes. Beyond Salt Lake City, West Valley City is the only location with both low-wage employment centers and affordable housing. The transportation infrastructure as well as the siting of affordable housing are

Figure 6
Minority Owner-Occupied Units and Proximity to Low-Wage Jobs in Salt Lake County (excluding Salt Lake City), 2010



two factors contributing to high levels of minority and Hispanic concentrations in the geographic arc running from Salt Lake City's River District, south through South Salt Lake, and west to West Valley City and Taylorsville.

Figure 7
Minority Owner-Occupied Units and Proximity to Low-Wage Jobs in Salt Lake City, 2010

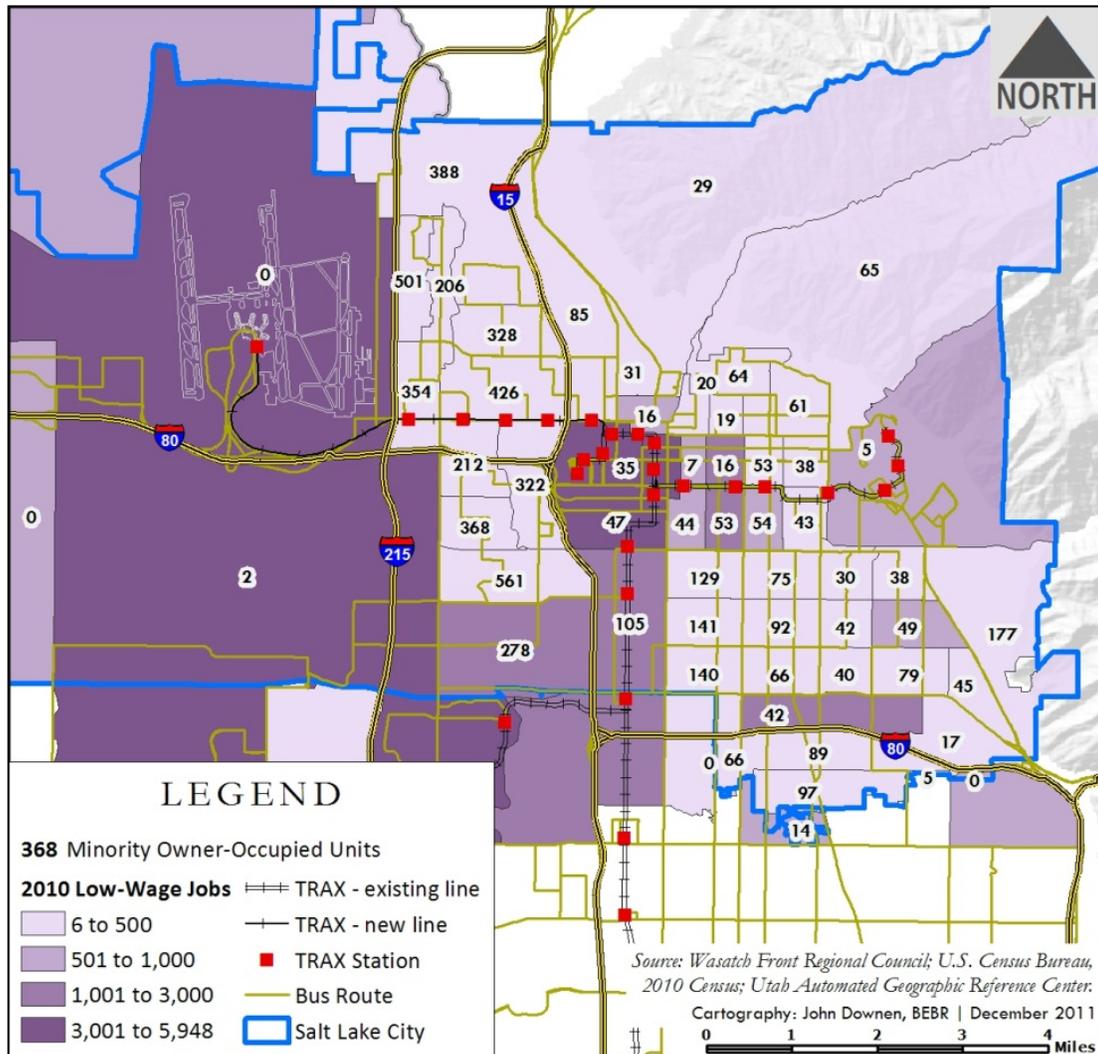


Figure 7 overlays the number of minority owner-occupied units with the density of low-wage jobs (in shades of purple) in Salt Lake City. Most of the low-wage jobs are located west of I-215, which includes the Salt Lake City International Airport, north of I-80, and the industrial area south of I-80. Other areas with low-wage jobs are in the central downtown area and the commercial areas in the southern part of the city on both sides of I-15.

The yellow lines in Figure 7 show the bus routes in the city. The east side has more bus routes running north to south than the River District, due primarily to the street patterns which reflect high industrial and commercial use on the west side, versus residential development on the east side. The recently completed TRAX line along West Temple is a very positive development providing rapid

and efficient public transportation for northwest Salt Lake City residents, who are disproportionately protected classes. The large employment centers of the Salt Lake International Airport, Salt Lake City's Central Business District, and the University of Utah's medical complex, which together combine for over 100,000 jobs, are now much more accessible for transit-needy individuals in Salt Lake City's northwest quadrant.

Figure 8 shows the number of minority renter-occupied units in Salt Lake County. In 2010, there were 33,359 renter households that were minorities, representing 30 percent of all renter households in the county. Minority renter-occupied units are, of course, also concentrated in the arc from the River District of Salt Lake City through South Salt Lake and west to West Valley City. The neighborhoods south of downtown Salt Lake City and near the University of Utah campus also have concentrations of minority renters. However, note that the minority renters near the University of Utah do not reflect the socioeconomic and racial demographics of the minorities who live in the River District. In large swaths of both southeast and southwest Salt Lake County the minority renter population is less than 100 households in many census tracts.

Figure 8
Minority Renter-Occupied Units by Tract in Salt Lake County, 2010

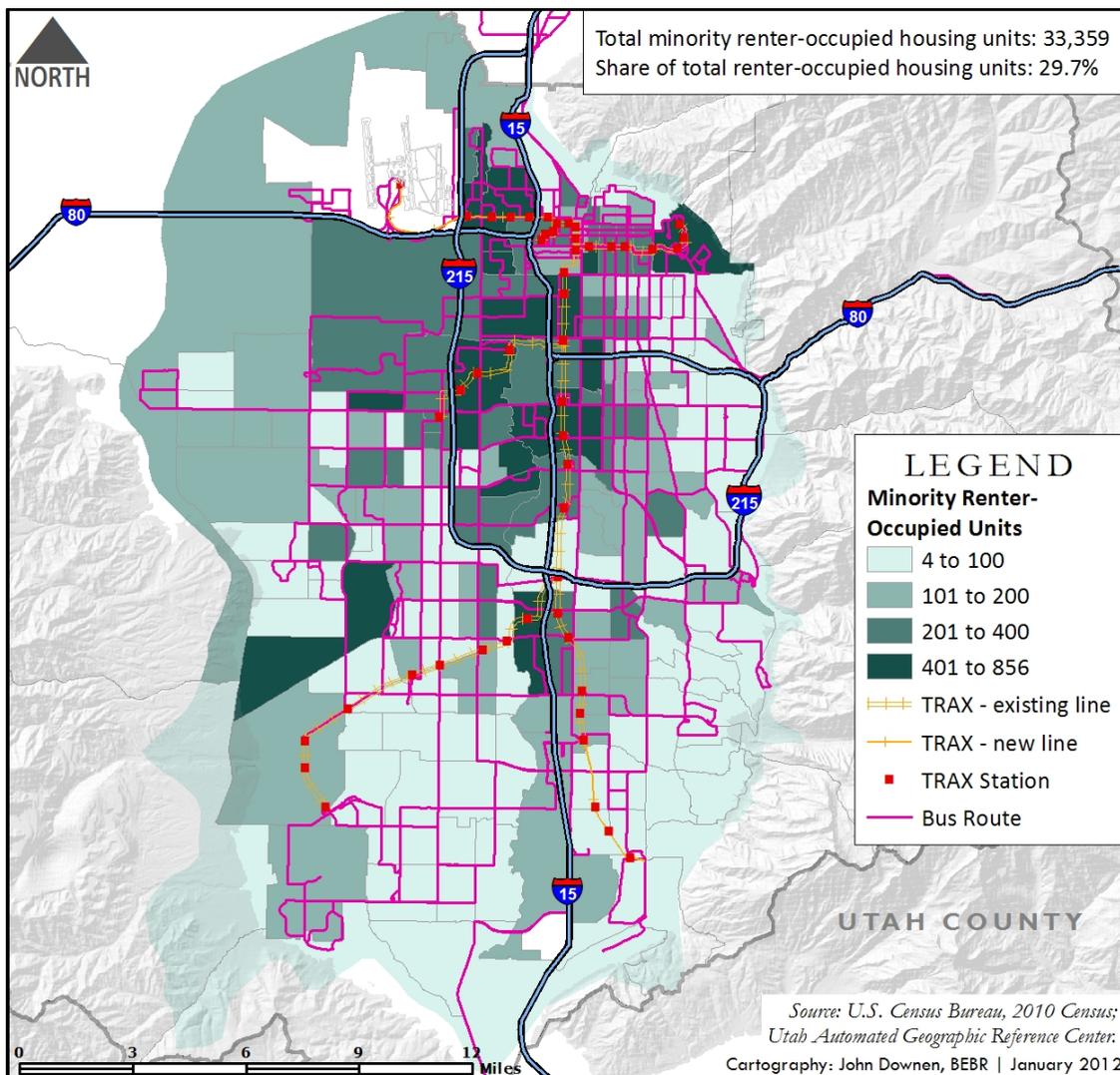


Figure 9 shows the minority share of renter-occupied units in Salt Lake County. The census tracts in most parts of the River District and West Valley City have minority shares of renter-occupied units above 45 percent. Some other areas with large minority shares of renters include the west side of South Salt Lake and Midvale. On the other hand, nearly all areas in the southern and easternmost part of the county have minority shares below the overall county average of 30 percent. This segregation is due in part to the scarcity of rental housing in the southern part of the county. Siting of rental housing is a key factor in the concentrations of protected classes in the northwest and west mid-valley portions of the county. Furthermore, given that minorities tend to have larger household sizes, the difficulties in finding suitable rental housing with this accommodation geographically restrict the minority rental population.

Figure 9
Minority Share of Renter-Occupied Units by Tract in Salt Lake County, 2010

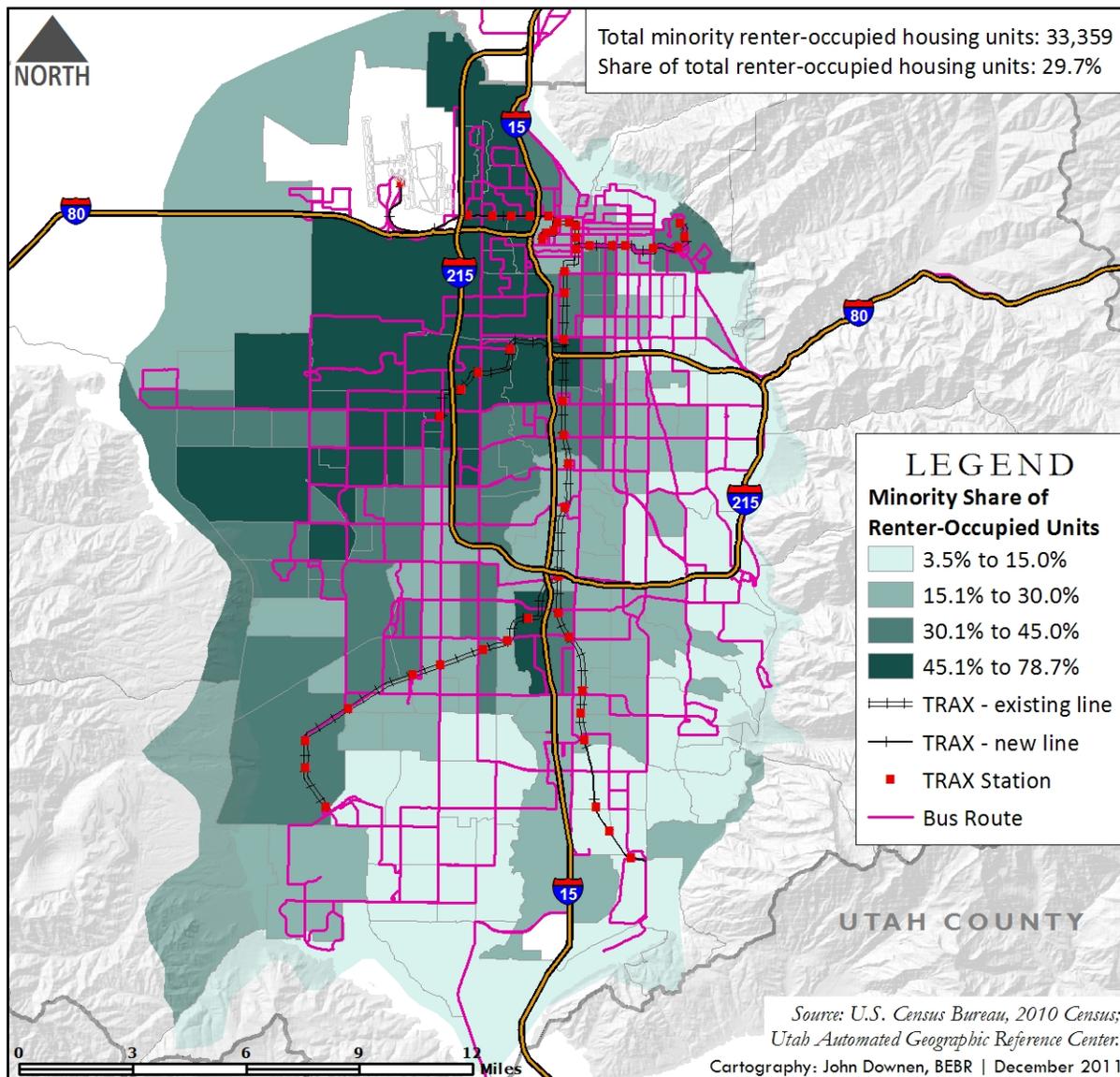


Figure 10
Minority Renter-Occupied Units and Proximity to Low-Wage Jobs in
Salt Lake County (excluding Salt Lake City), 2010

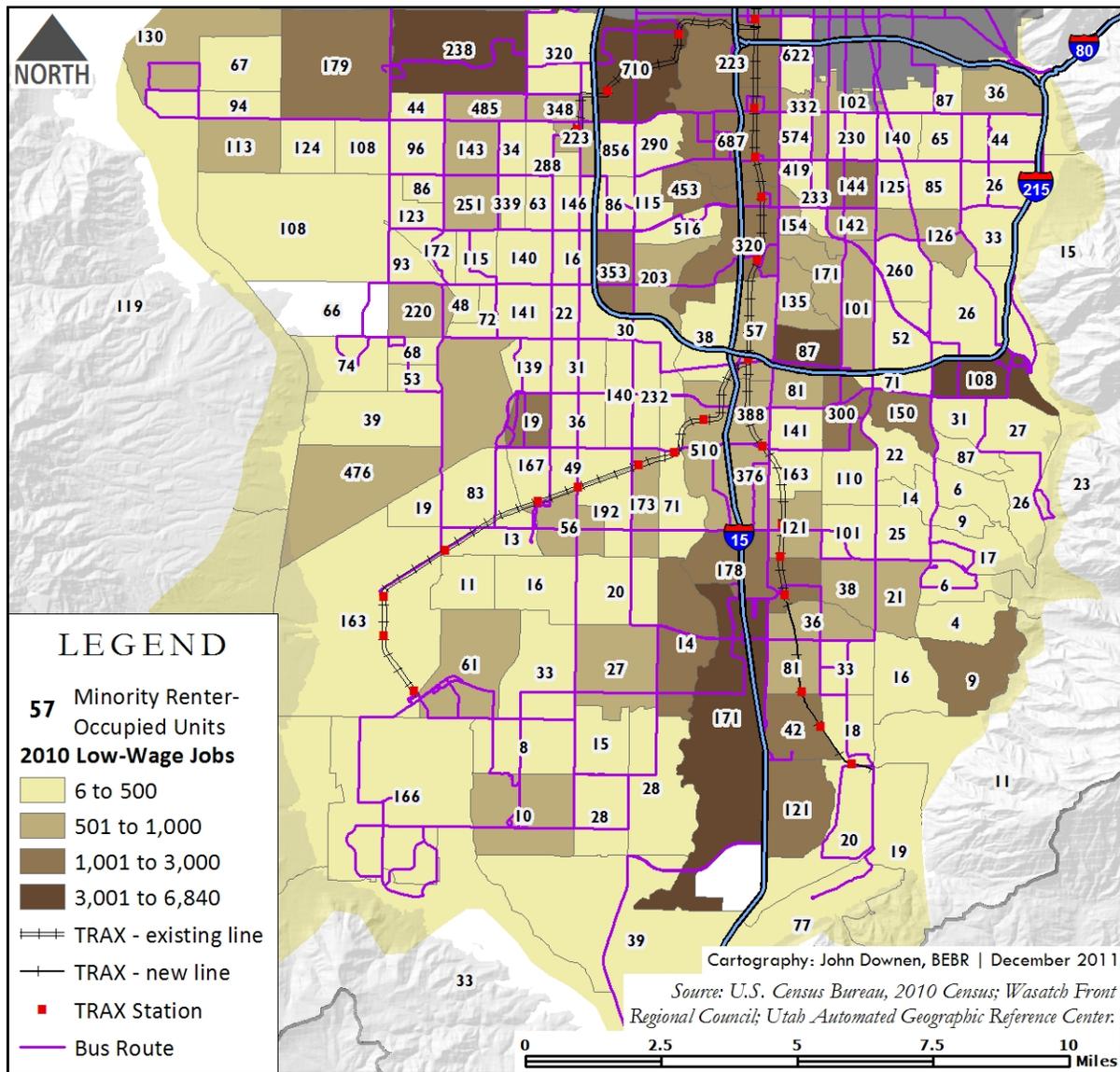
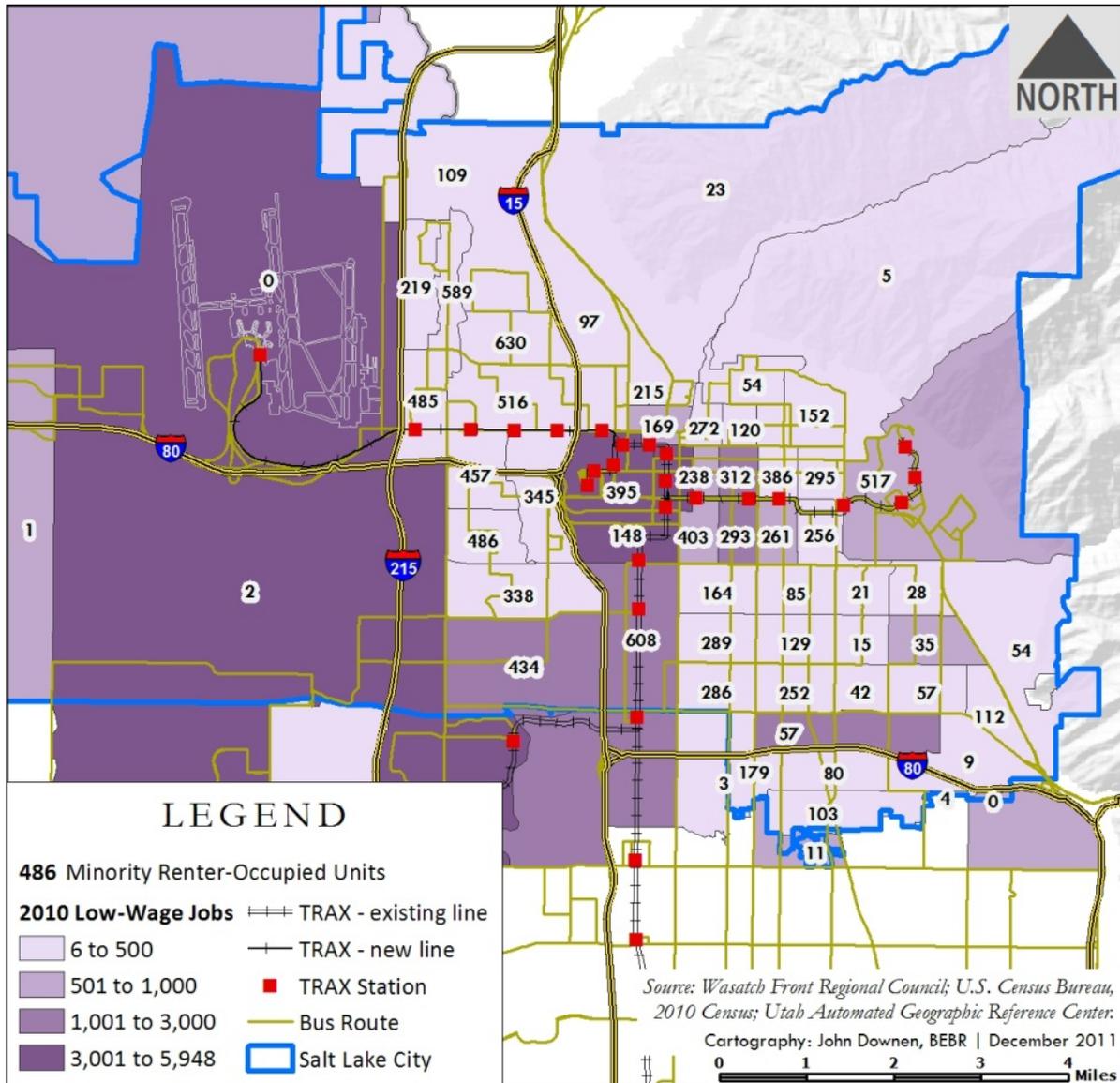


Figure 10 overlays the number of minority renter-occupied units with the density of low-wage jobs (in shades of yellow) for all areas of Salt Lake County, south of Salt Lake City. Low-wage jobs are defined as those jobs with an average wage below the county’s average wage. The northwest portion of the map (West Valley City) shows a heavy concentration of minority renters in close proximity to low-wage employment centers. The census tract adjacent and east of I-215 with 3,000-6,000 low-wage jobs (dark brown) has 710 minority renter households. In nearby census tracts there are also a large number of minority renters, again within relatively close proximity to employment centers. Job opportunities, affordable housing and transportation access appears to be quite favorable in this area of the county. However, the other highly concentrated areas of low-wage employment—Murray (Fashion Place Mall), Cottonwood Heights, and Sandy/Draper—lack transit access and available,

affordable rental housing to connect employment areas with low-income minority renter households.

Figure 11 shows that the problems of transportation and employment also exist in Salt Lake City’s west side. The new TRAX line running from the airport through the Central Business District, to the University of Utah will open up transportation access to educational opportunities, as well as employment opportunities for those living near the North Temple line.

Figure 11
Minority Renter-Occupied Units and Proximity to Low-Wage Jobs in Salt Lake City, 2010

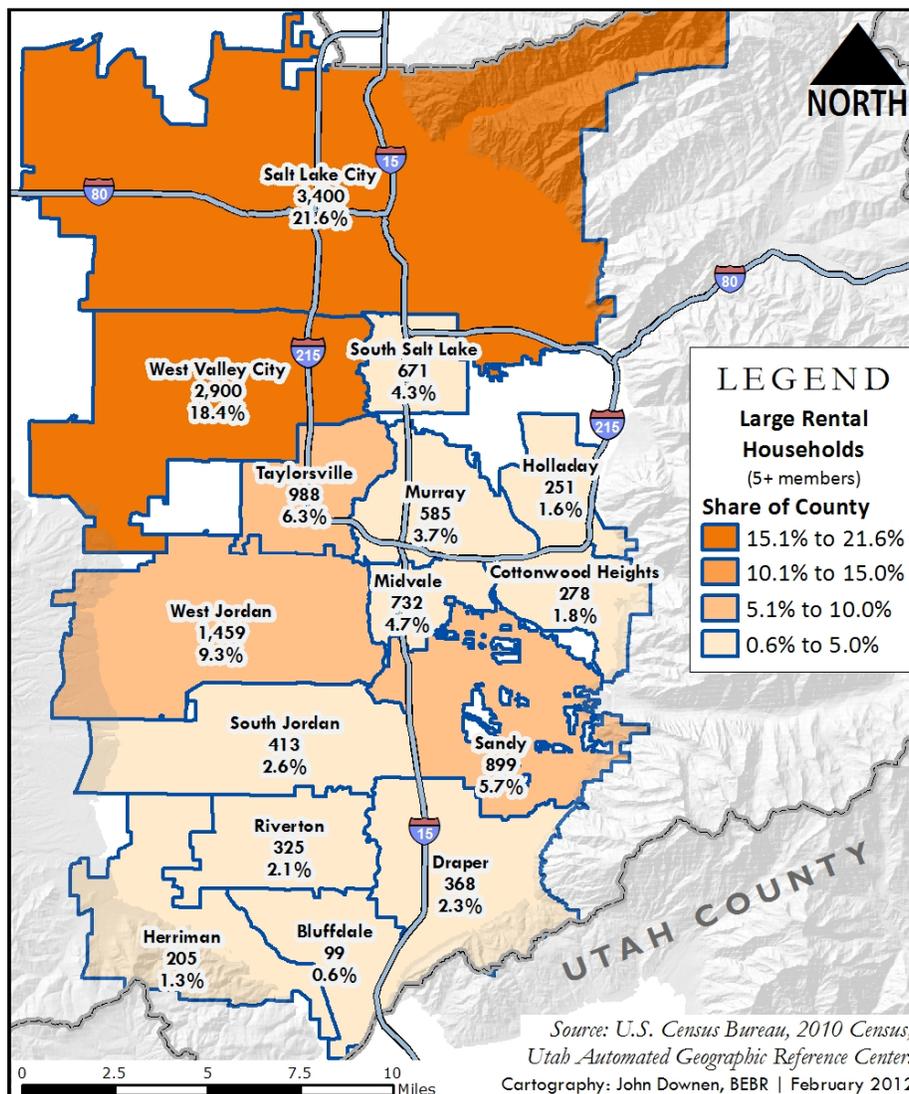


But for those large number of minority renters (over 2,000) living in Glendale and Poplar Grove—approximately I-15 to Redwood Road, and I-80 (westbound) to 2100 South—do not have easy accessibility to employment centers such as the airport, downtown, and commercial areas. In contrast, minority renters living near the CBD have walking distance proximity to a large concentration of low-wage jobs in downtown Salt Lake City.

Minority renters near the University of Utah are mostly college and graduate students, who have subsidized access to public transportation in the city. However, there are a significant number of non-student minority renters west of the University of Utah that live north and south of the 400 South TRAX line. These renters have good transportation access to employment centers. There are about 3,800 minority renters bordering the TRAX line, accounting for one-third of all minority renter households in Salt Lake City.

For the minority concentrations of renter- and owner-occupied housing in a narrow band from west Salt Lake City through South Salt Lake and West Valley City, transit access has mixed results for minority populations. The most advantaged are those in Salt Lake City along the TRAX lines and those in West Valley City near I-215. But for those minority households in the Glendale and Poplar Grove communities of Salt Lake City, and the residents of Magna, West Valley City (west of Bangerter), and Taylorsville, transit accessibility to employment opportunities are more limited.

Figure 12
Large Renter Household by City, 2010
 (Five or more persons)



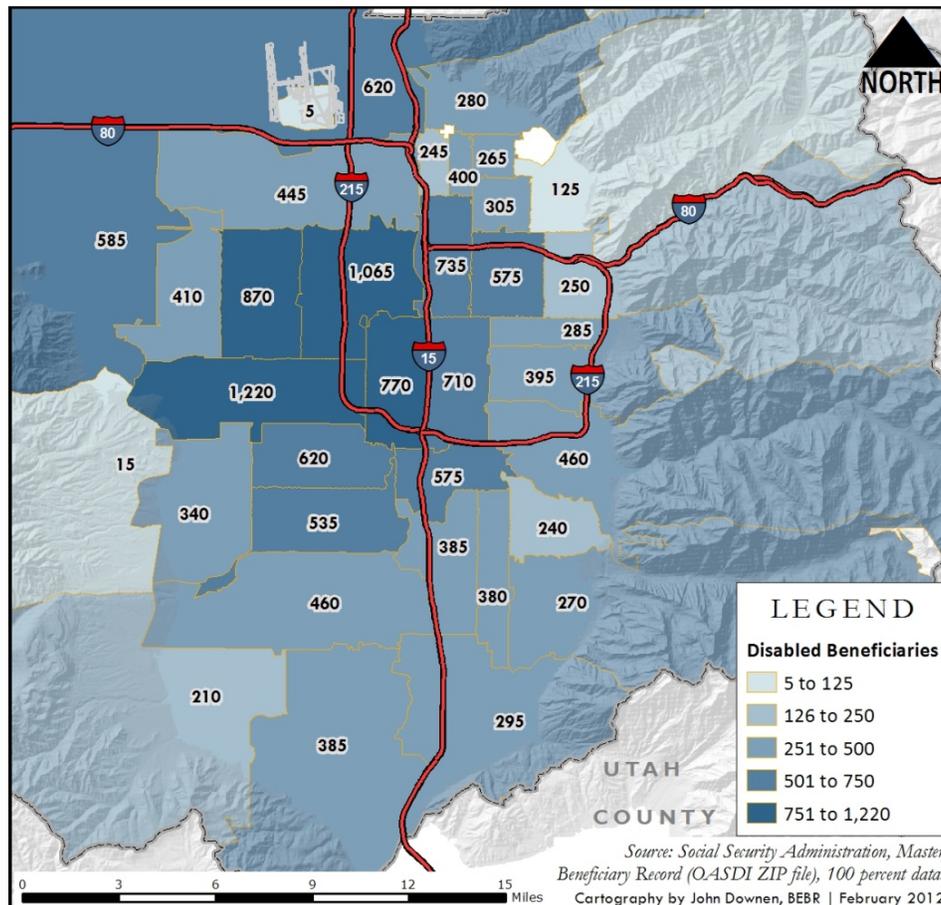
Population Concentration by Familial Status

Housing discrimination based on familial status ranks as the third most often cited discrimination complaint. The nature of these complaints generally regards large families trying to find suitable rental housing. Some landlords are reluctant to rent to households with several children. Consequently, large households often have considerable difficulty finding rental housing. Due to the siting of affordable rental housing, these families are limited in their housing opportunities. Census data shows that nearly half of all large renter households live in Salt Lake City, West Valley City, South Salt Lake, and Taylorsville *Figure 12*. Less than 10 percent of large families renting live in the five city area of South Jordan, Riverton, Herriman, Bluffdale, and Draper. These five cities account for over 15 percent of the county's population.

Population Concentration by Disability

The residential patterns of disabled individuals are difficult to ascertain due to data limitations. At present the best proxy is the location of recipients of Social Security Disability Income (SSDI). These data show again that the greatest areas of concentration of disabled persons is mid-valley Salt Lake County; including South Salt Lake, Murray, Midvale, West Valley City, Taylorsville, and unincorporated Kearns *Figure 13*. These households have a relatively high likelihood of being low-income renters. The spatial distribution patterns again reflect public policies regarding the siting of affordable rental housing.

Figure 13
Person Qualifying for Social Security Disability by Zip Code

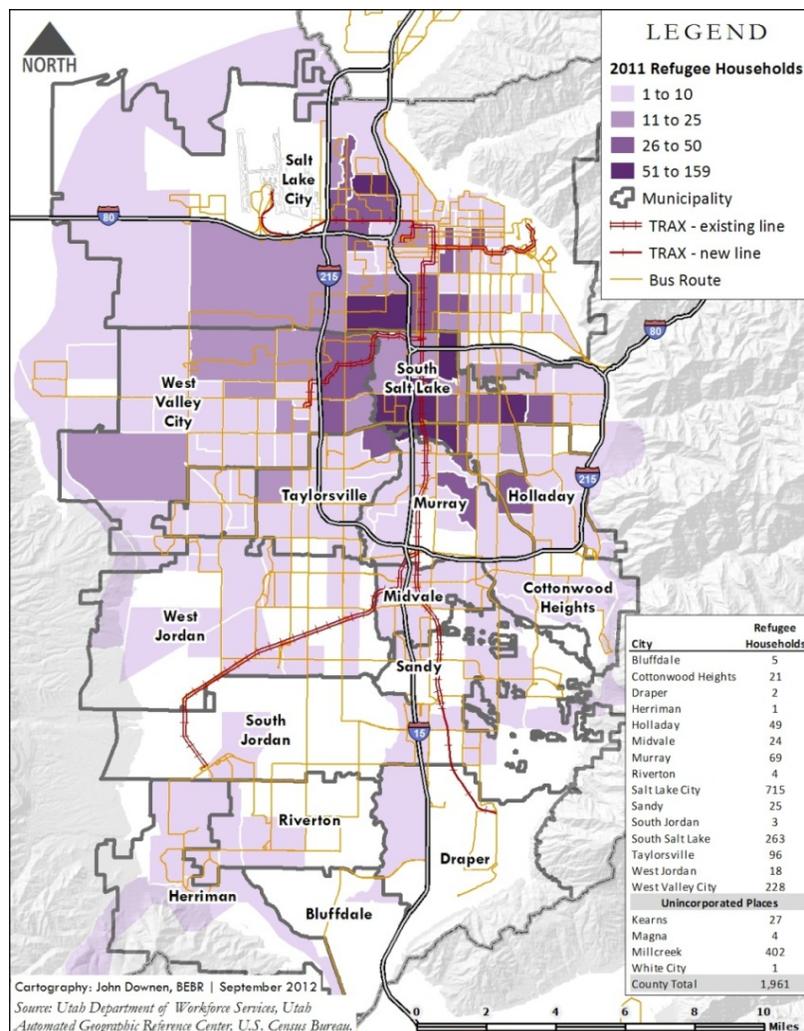


Concentrations of Refugees

There are almost 2,000 refugee households in Salt Lake County. These households are a protected class on the basis of national origin. Refugee households tend to concentrate in geographic areas due to self-selection and well-intended public policy. Refugee location practices and service providers have often reinforced racially concentrated areas of poverty in Salt Lake County.

Refugee households are concentrated in the northern and central census tracts of Salt Lake County. Half of all refugee households are located in a few Salt Lake City west side census tracts, and in South Salt Lake City. As shown in *Figure 14*, the census tracts with the highest number of refugees are more centrally located along I-15, and even include some east side tracts; a slightly different spatial distribution than minorities and poor residents. There are many overlapping tracts of refugees, minorities, and low-income residents especially in the western and central tracts of Salt Lake City, the eastern portions of West Valley City, and in the central tracts of South Salt Lake, Taylorsville, and Murray. The densest concentrations however, remain in the tracts along I-80, through Salt Lake City, South Salt Lake, and Millcreek. However, there are a number of refugee households in eastern tracts in cities such as Holladay, Murray, and Millcreek.

Figure 14
Refugee Households in Salt Lake County, 2011



The farther south in the valley the tract is located, the fewer the number of refugee residents that reside in the city, especially in South Jordan, Draper, and Bluffdale. Though a higher percentage of refugee families are located on the eastern half the county, the densest concentrations still tend to be in low-opportunity tracts. These tracts tend to offer low access to employment, schools, and housing opportunities for the protected classes. As a result, there is still a large amount of disparity between the opportunity available to refugees and non-Hispanic white residents in the county.

Public Assistance Recipients and Concentrations of Very Low-Income Protected Classes

To further identify concentrations of poverty the recipients of public assistance have been mapped by zip code for Hispanic individuals, large families (five members or more), and disabled individuals using data from the Department of Workforce Services. The concentrations of poor individuals and large families reflects a similar geospatial distribution to the overall (poor and non-poor) distribution of protected classes. *Figures 15-17* show the concentrations which occur predominately on the west side of the county. Disabled recipients however, are more widely disbursed than either large families or poor Hispanic individuals. Just as important as the geospatial distribution is the absolute and percentage change in number of recipients. The number of Hispanic individuals on public assistance increased by 21 percent between 2007 and 2012 *Table 3*.

Figure 15
Hispanic Recipients of Public Assistance

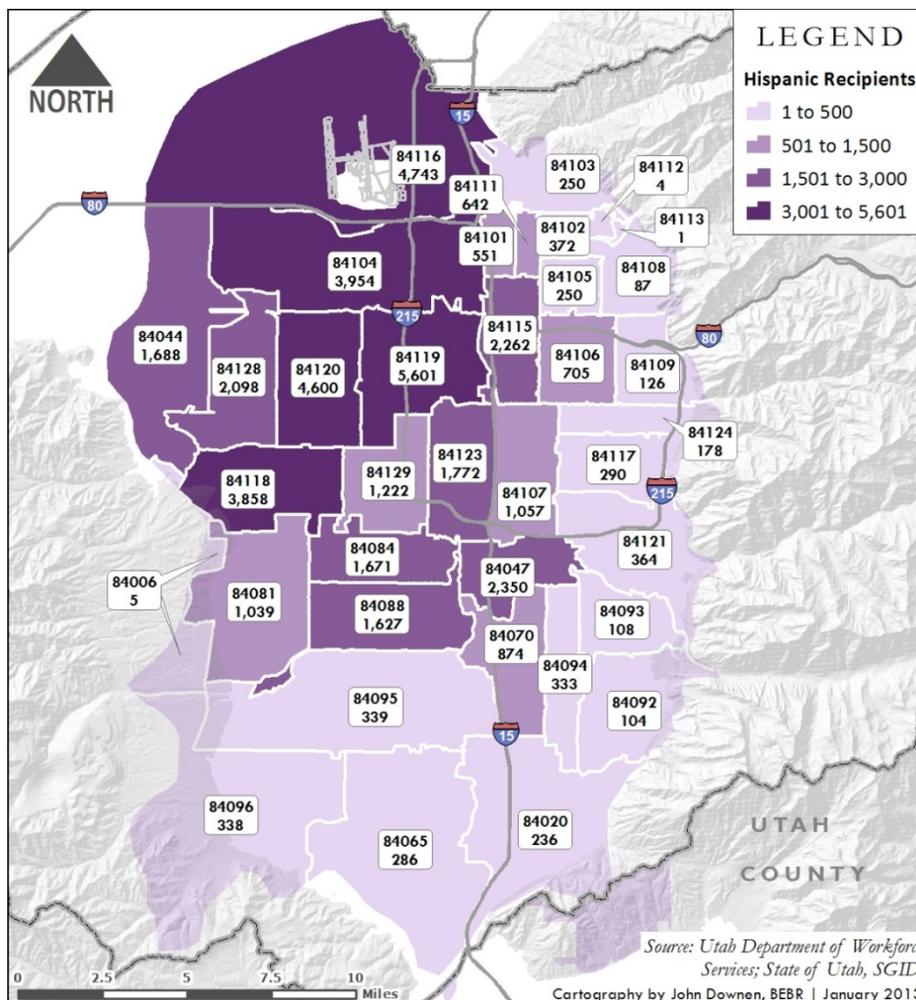


Table 4 uses the same DWS data on public assistance to calculate the number of large family households on public assistance in 2007 and 2012. A larger family size is classified as a household of five or more individuals living together. Only in four zip codes did the number of large families on public assistance decrease. Countywide, the number of large families receiving public assistance increased, by a remarkable 61 percent over the past five years. Figure 16 displays the concentrations of these large families by zip code in Salt Lake County. Poor large families are heavily concentrated in both the Hunter and Granger neighborhoods of West Valley City, Kearns, and unincorporated Salt Lake County.

Figure 16
Large Families Receiving Public Assistance, 2012

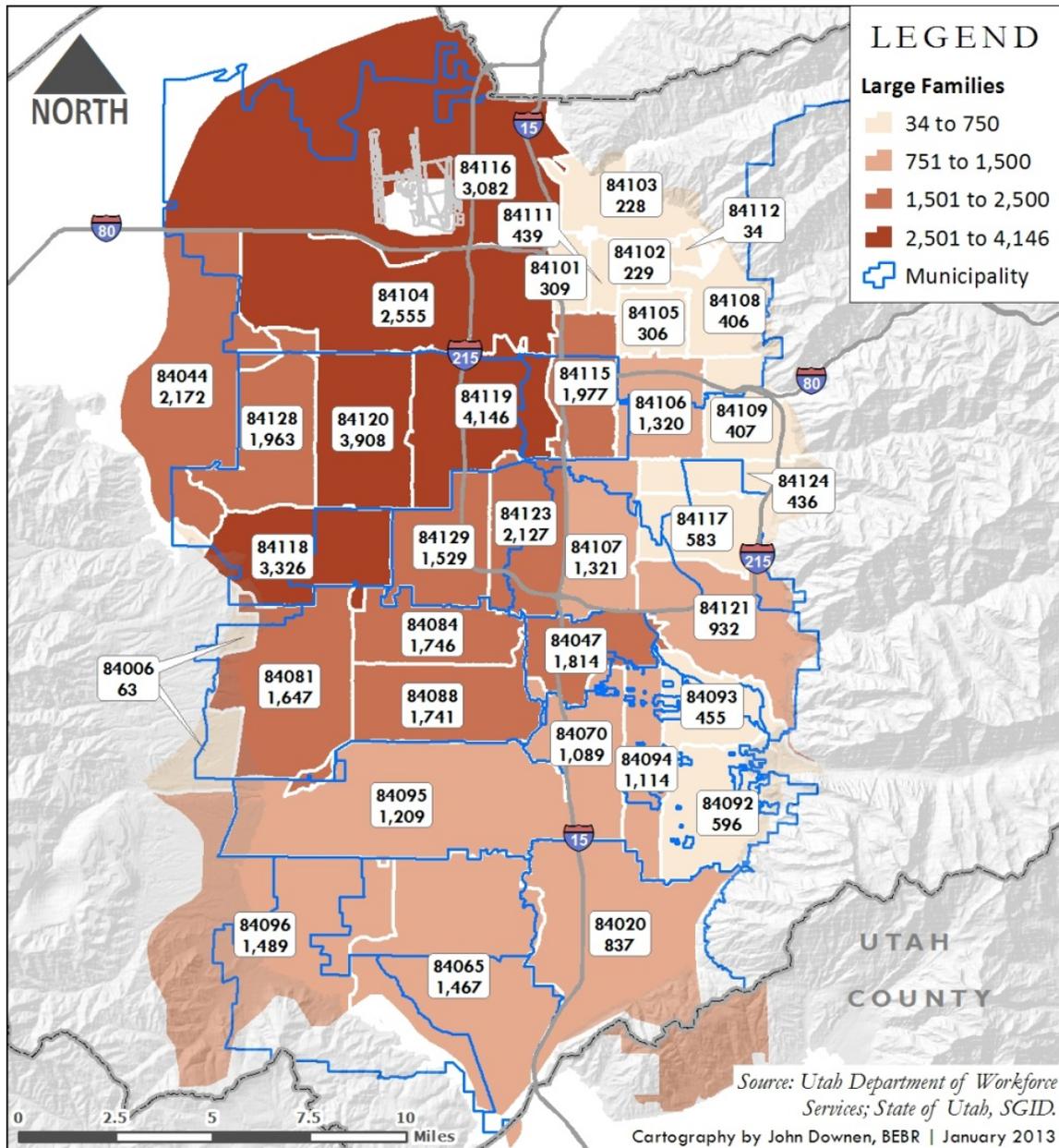


Table 3
Hispanic Individuals on Public Assistance, 2007-2012

City	Zip Code	2007 Hispanic	2012 Hispanic	Absolute Change	Percent Change
Bluffdale	84065	250	286	36	14.4%
Cottonwood Heights	84171	-	0	-	-
Cottonwood Heights (and Big Cottonwood)	84121	278	364	86	30.9%
Draper	84020	182	236	54	29.7%
Herriman	84096	139	338	199	143.2%
Holladay	84117	211	290	79	37.4%
Magna	84044	1,391	1,688	297	21.4%
Midvale	84047	1,957	2,350	393	20.1%
Murray	84107	863	1,057	194	22.5%
Murray (IMC)	84157	3	2	-1	-33.3%
Salt Lake City	84101	560	551	-9	-1.6%
Salt Lake City	84102	468	372	-96	-20.5%
Salt Lake City	84103	347	250	-97	-28.0%
Salt Lake City	84104	3,444	3,954	510	14.8%
Salt Lake City	84105	280	250	-30	-10.7%
Salt Lake City	84110	27	11	-16	-59.3%
Salt Lake City	84111	731	642	-89	-12.2%
Salt Lake City	84112	4	4	0	0.0%
Salt Lake City	84113	4	1	-3	-75.0%
Salt Lake City	84114	11	9	-2	-18.2%
Salt Lake City	84152	0	1	1	-
Salt Lake City	84116	4,202	4,743	541	12.9%
Salt Lake City (and Millcreek)	84106	708	705	-3	-0.4%
Salt Lake City	84147	2	-	-	-
Salt Lake City (and Emigration Canyon)	84108	64	87	23	35.9%
Sandy	84070	604	874	270	44.7%
Sandy	84090	0	-	-	-
Sandy	84091	2	0	-2	-100.0%
Sandy (and Little Cottonwood)	84092	91	104	13	14.3%
Sandy	84093	92	108	16	17.4%
Sandy	84094	312	333	21	6.7%
South Jordan	84095	233	339	106	45.5%
South Salt Lake	84115	2,000	2,262	262	13.1%
South Salt Lake	84165	5	1	-4	-80.0%
Taylorsville	84123	1,432	1,772	340	23.7%
Taylorsville (and Kearns)*	84118	3,895	3,858	-37	-0.9%
Taylorsville*	84129	N/A	1,222	-	-
Unincorporated (Millcreek and Mt. Olympus)	84124	149	178	29	19.5%
Unincorporated (Brigham Canyon)	84006	11	5	-6	-54.5%
Unincorporated (East Millcreek/Parley's Canyon)	84109	80	126	46	57.5%
West Jordan*	84081	N/A	1,039	-	-
West Jordan*	84084	2,006	1,671	-335	-16.7%
West Jordan*	84088	1,406	1,627	221	15.7%
West Valley City	84120	3,716	4,600	884	23.8%
West Valley City	84127	-	0	-	-
West Valley City	84128	1,465	2,098	633	43.2%
West Valley City	84170	6	10	4	66.7%
Sandy (and Little Cottonwood)	84092	91	104	13	14.3%
West Valley City*	84119	4,280	5,601	1,321	30.9%
Salt Lake County		37,911	46,019	8,108	21.4%

Source: BEBR Calculations from Utah DWS Data
 *Newly formed, or split zip codes between 2007 & 2012

**Table 4
Large Family Households on Public Assistance, 2007-2012**

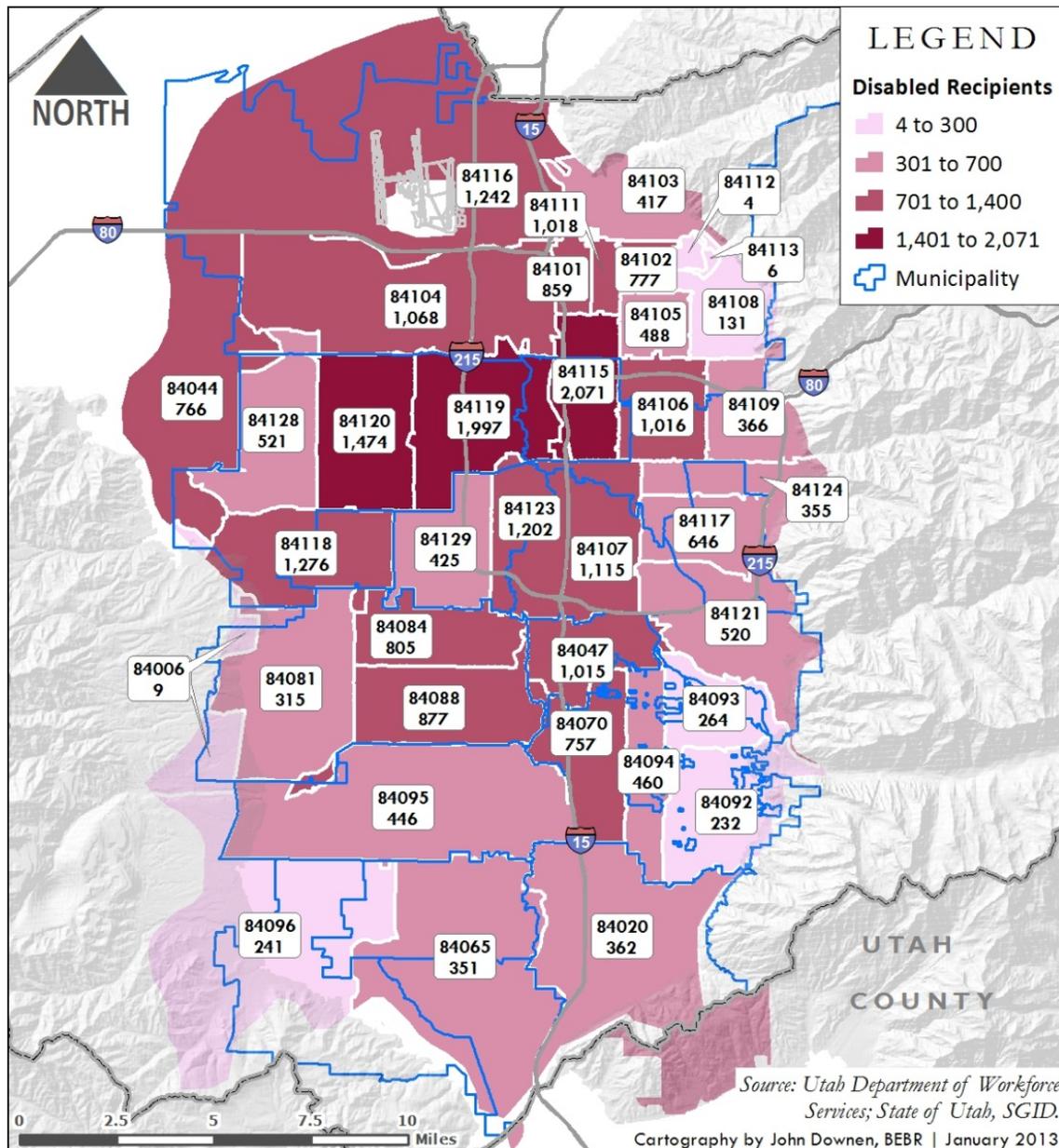
City	Zip Code	2007 Family Size ≥5	2012 Family Size ≥5	Absolute Change	Percent Change
Bluffdale	84065	911	1,467	556	61.0%
Cottonwood Heights	84171	-	6	-	-
Cottonwood Heights (and Big Cottonwood)	84121	558	932	374	67.0%
Draper	84020	498	837	339	68.1%
Herriman	84096	363	1,489	1,126	310.2%
Holladay	84117	301	583	282	93.7%
Magna	84044	1,405	2,172	767	54.6%
Midvale	84047	1,007	1,814	807	80.1%
Murray	84107	641	1,321	680	106.1%
Murray (IMC)	84157	10	0	-10	-100.0%
Salt Lake City	84101	299	309	10	3.3%
Salt Lake City	84102	284	229	-55	-19.4%
Salt Lake City	84103	197	228	31	15.7%
Salt Lake City	84104	1,968	2,555	587	29.8%
Salt Lake City	84105	291	306	15	5.2%
Salt Lake City	84110	16	5	-11	-68.8%
Salt Lake City	84111	471	439	-32	-6.8%
Salt Lake City	84112	47	34	-13	-27.7%
Salt Lake City	84113	5	0	-5	-100.0%
Salt Lake City	84114	6	0	-6	-100.0%
Salt Lake City	84152	0	0	0	0.0%
Salt Lake City	84116	2,159	3,082	923	42.8%
Salt Lake City (and Millcreek)	84106	1,023	1,320	297	29.0%
Salt Lake City	84147	0	-	-	-
Salt Lake City (and Emigration Canyon)	84108	384	406	22	5.7%
Sandy	84070	588	1,089	501	85.2%
Sandy	84090	0	-	-	-
Sandy	84091	0	0	0	0.0%
Sandy (and Little Cottonwood)	84092	300	596	296	98.7%
Sandy	84093	292	455	163	55.8%
Sandy	84094	776	1,114	338	43.6%
South Jordan	84095	568	1,209	641	112.9%
South Salt Lake	84115	1,199	1,977	778	64.9%
South Salt Lake	84165	0	1	1	-
Taylorsville	84123	1,229	2,127	898	73.1%
Taylorsville (and Kearns)*	84118	2,828	3,326	498	17.6%
Taylorsville*	84129	N/A	1,529	-	-
Unincorporated (Millcreek and Mt. Olympus)	84124	278	436	158	56.8%
Unincorporated (Brigham Canyon)	84006	16	63	47	293.8%
Unincorporated (East Millcreek/Parley's Canyon)	84109	282	407	125	44.3%
West Jordan*	84081	N/A	1,647	-	-
West Jordan*	84084	1,871	1,746	-125	-6.7%
West Jordan*	84088	1,339	1,741	402	30.0%
West Valley City	84120	2532	3,908	1,376	54.3%
West Valley City	84127	-	5	-	-
West Valley City	84128	1,020	1,963	943	92.5%
West Valley City	84170	5	0	-5	-100.0%
West Valley City*	84119	2,506	4,146	1,640	65.4%
Salt Lake County		30,473	49,019	18,546	60.9%

Source: BEBR Calculations from Utah DWS Data

*Newly formed, or split zip codes between 2007 & 2012

Table 5 shows the number of disabled individuals receiving public assistance in 2007 and 2012. To be considered disabled and on public assistance by DWS standards, each individual must be receiving financial assistance, and have a verified condition by the Medical Review Board. Not surprising, the number of disabled individuals on public assistance increased between 2007 and 2012, by about 21 percent. The largest increases were seen in the northern and central zip codes in cities including: Salt Lake City, West Valley City, and Midvale. Figure 17 maps the number of disabled individuals on public assistance in 2012, by zip code in Salt Lake County.

Figure 17
Disabled Recipients of Public Assistance, 2012



**Table 5
Disabled Individuals on Public Assistance, 2007-2012**

City	Zip Code	2007 Disabled	2012 Disabled	Absolute Change	Percent Change
Bluffdale	84065	346	351	5	1.4%
Cottonwood Heights	84171	-	1	-	-
Cottonwood Heights (and Big Cottonwood)	84121	451	520	69	15.3%
Draper	84020	261	362	101	38.7%
Herriman	84096	75	241	166	221.3%
Holladay	84117	595	646	51	8.6%
Magna	84044	605	766	161	26.6%
Midvale	84047	712	1,015	303	42.6%
Murray	84107	902	1,115	213	23.6%
Murray (IMC)	84157	4	6	2	50.0%
Salt Lake City	84101	591	859	268	45.3%
Salt Lake City	84102	880	777	-103	-11.7%
Salt Lake City	84103	446	417	-29	-6.5%
Salt Lake City	84104	926	1,068	142	15.3%
Salt Lake City	84105	507	488	-19	-3.7%
Salt Lake City	84110	14	13	-1	-7.1%
Salt Lake City	84111	991	1,018	27	2.7%
Salt Lake City	84112	6	4	-2	-33.3%
Salt Lake City	84113	6	6	0	0.0%
Salt Lake City	84114	10	4	-6	-60.0%
Salt Lake City	84152	1	1	0	0.0%
Salt Lake City	84116	1,060	1,242	182	17.2%
Salt Lake City (and Millcreek)	84106	901	1,016	115	12.8%
Salt Lake City	84147	5	-	-	-
Salt Lake City (and Emigration Canyon)	84108	129	131	2	1.6%
Sandy	84070	680	757	77	11.3%
Sandy	84090	3	-	-	-
Sandy	84091	31	15	-16	-51.6%
Sandy (and Little Cottonwood)	84092	180	232	52	28.9%
Sandy	84093	215	264	49	22.8%
Sandy	84094	369	460	91	24.7%
South Jordan	84095	295	446	151	51.2%
South Salt Lake	84115	1,768	2,071	303	17.1%
South Salt Lake	84165	22	4	-18	-81.8%
Taylorsville	84123	935	1,202	267	28.6%
Taylorsville (and Kearns)*	84118	1,209	1,276	67	5.5%
Taylorsville*	84129	N/A	425	-	-
Unincorporated (Millcreek and Mt. Olympus)	84124	281	355	74	26.3%
Unincorporated (Brigham Canyon)	84006	6	9	3	50.0%
Unincorporated (East Millcreek/Parley's Canyon)	84109	367	366	-1	-0.3%
West Jordan*	84081	N/A	315	-	-
West Jordan*	84084	836	805	-31	-3.7%
West Jordan*	84088	706	877	171	24.2%
West Valley City	84120	1,101	1,474	373	33.9%
West Valley City	84127	-	1	-	-
West Valley City	84128	382	521	139	36.4%
West Valley City	84170	6	3	-3	-50.0%
West Valley City*	84119	1,644	1,997	353	21.5%
Salt Lake County		21,460	25,942	4,482	20.9%

Source: BEBR Calculations from Utah DWS Data

*Newly formed, or split zip codes between 2007 & 2012

Predicted Racial/Ethnic Composition

Table 6 shows the ratio between predicted and actual racial/ethnic composition in Salt Lake County. The predicted percent of minority households is the expected composition based on the income distribution in the metropolitan area, by race and ethnicity. The actual composition is based on estimates from the 2005-2009 American Community Survey 5-year estimates.

All the major minority groups have household shares comparable to the predicted value since the county encompasses a large region of the metro area from which the income-based predictions were created. Thus, a better indication of segregation would be to examine the actual and predicted minority household shares at the city level Table 7. Riverton, South Jordan, Cottonwood Heights, and Holladay—all cities in the southern and eastern part of the county—have minority household shares that are only about half the predicted shares. Nearly all the other cities in the southeastern region of the county also have below-predicted minority household shares. As expected, only cities in the northwestern part of the county such as Salt Lake City and West Valley City have minority shares above the predicted value. In fact, the predicted minority household shares do not vary greatly among cities, meaning that if income were the only sole determinant of housing selection, the expected minority population would be distributed more evenly across the county. Again another measure of minority concentrations in Salt Lake County, which in part can be traced back to public policies.

**Table 6
Predicted Racial/Ethnic
Composition Ratio in
Salt Lake County**

	Percent of Households		Actual/ Predicted Ratio
	Actual	Predicted	
Minority	17.6%	14.8%	1.19
Asian	2.8%	2.1%	1.30
Black	1.3%	1.1%	1.17
Hispanic/Latino	11.4%	9.8%	1.17

Source: HUD Spreadsheet for Sustainable Communities Grantees

**Table 7
Predicted Minority
Composition Ratio in
Salt Lake County Cities**

	Percent of Households		Actual/ Predicted Ratio
	Actual	Predicted	
Riverton	5.8%	12.7%	0.46
South Jordan	6.1%	11.9%	0.52
Cottonwood Heights	7.0%	13.4%	0.52
Holladay	7.8%	14.1%	0.55
Murray	9.7%	15.1%	0.64
Herriman	8.0%	12.4%	0.65
Sandy	9.6%	13.0%	0.74
Draper	9.5%	12.2%	0.78
Bluffdale	11.2%	12.2%	0.92
West Jordan	16.9%	14.2%	1.18
Salt Lake County	17.6%	14.8%	1.19
Taylorsville	20.7%	15.2%	1.36
Midvale	23.5%	16.6%	1.42
Salt Lake City	23.1%	16.3%	1.42
South Salt Lake	30.2%	18.1%	1.66
West Valley City	32.8%	15.8%	2.08

Source: HUD Spreadsheet for Sustainable Communities Grantees

**Actual/Predicted
Ratio Scale**

Value Ranges	Interpretation of Actual Share
0-0.5	Severely Below Predicted
0.5-0.7	Moderately Below Predicted
0.7-0.9	Mildly Below Predicted
0.9-1.1	Approximates Predicted
> 1.1	Above Predicted

Dissimilarity and Exposure Indices

HUD recommends the use of a dissimilarity index to measure segregation. The dissimilarity index below was developed by Brown University's program in Spatial Structures in Social Sciences. This index is recommended by HUD and was used in their Webinar on Regional Analysis of Impediments in February 2012.

The Discover America dissimilarity indices are only calculated for metropolitan areas and cities. Therefore the indices used are for the Salt Lake Metropolitan area. However, since Salt Lake County accounts for over 90 percent of the metropolitan area, the metropolitan index numbers are very representative of Salt Lake County.

The dissimilarity index measures whether one particular group is distributed across census tracts in the metropolitan area in the same way as another group. A high value indicates that the two groups tend to live in different tracts. Dissimilarity ranges from 0 to 100. A value of 60 (or above) is considered very high. It means that 60% (or more) of the members of one group would need to move to a different tract in order for the two groups to be equally distributed. Values of 40 or 50 are usually considered a moderate level of segregation, and values of 30 or below are considered to be fairly low. The dissimilarity index numbers for the Salt Lake Metropolitan area are moderate to low for the three race categories included. Hispanics show moderate levels of segregation with an index estimate of 42.9 percent *Table 8*.

Indices of exposure to other groups also range from 0 to 100, where a larger value means that the average group member lives in a tract with a higher percentage of persons from the other group. These indices depend on two conditions: the overall size of the other group and each group's settlement pattern. The Hispanic/White exposure index shows a decline over the past 30 years from 86.6 percent to 61.5 percent. Non-Hispanic whites account for 75 percent of the population in the metropolitan area. Therefore the 2010 Hispanic/White index is interpreted as Hispanics living in communities of less exposure to whites than would be typical if Hispanics/Whites were evenly distributed throughout the metro area. In that case, the index would be 75. Hispanics show a trend toward rising segregation and concentration, which is consistent with the demographic data mapped and discussed above.

Table 8
Dissimilarity and Exposure Indexes for Salt Lake Metropolitan Area

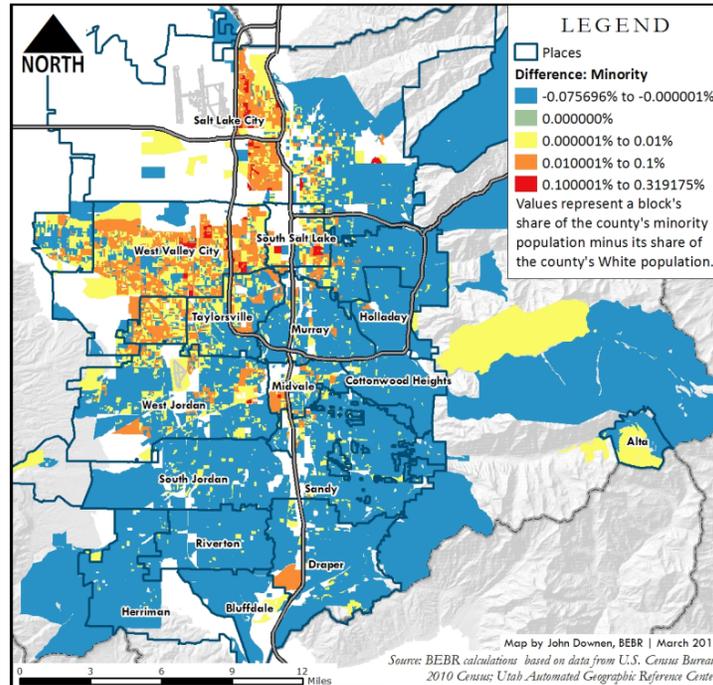
	1980	1990	2000	2010
Dissimilarity Index				
Black/White	48.3	44.0	35.4	34.0
Asian/White	25.0	32.0	30.2	27.0
Hispanic/White	31.3	31.4	44.1	42.9
Exposure Index				
Black/White	83.6	81.6	72.4	66.4
Asian/White	89.6	84.4	74.2	68.6
Hispanic/White	86.6	83.6	69.3	61.5

Source: USA Today Discover America, prepared by Brown University, Spatial Structures in Social Sciences.

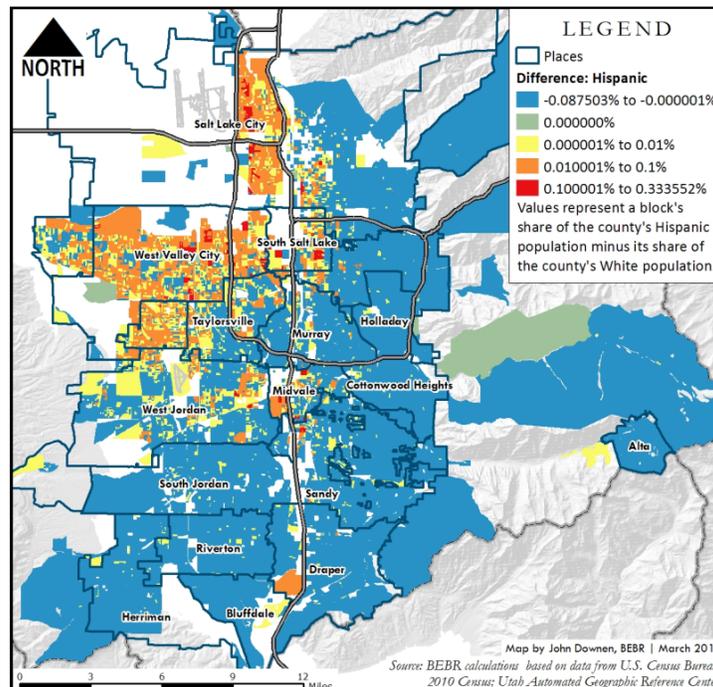
Figures 18 and 19 illustrate the concentrations of Hispanic and Minority individuals vis-à-vis the white population in Salt Lake County. These figures differ from the above table in geography. Rather than using census tract data compared to metropolitan data, these figures are based on block data

comparisons to Salt Lake County; again they tell a similar story. The blue in the maps show areas where the white population's share is disproportionately large. Yellow, orange, and red show areas of Hispanic concentration, with red being the most concentrated or segregated areas.

Map 18
Dissimilarity Index White/Hispanic



Map 19
Dissimilarity White/Minority



A Second Dissimilarity Index – A second dissimilarity index gives additional detail at the city level and again confirms patterns of segregation in the county. In order for the minority and non-Hispanic white geographic distribution in Salt Lake County to match their respective shares in the county, 43 percent of minorities would have to move to other census blocks in the county *Table 9*. Only Salt Lake City has dissimilarity indices greater than those at the county level given the extreme segregation of Hispanic and refugee populations in the River District. Note that the low dissimilarity indices among the southern and eastern cities in Salt Lake County are partly due to the low minority populations in these areas. While the dissimilarity index itself does not provide any geospatial information about segregation, *Figure 20* shows the levels of dissimilarities by census block.

Table 9
Dissimilarity Index

City	Dissimilarity Index			Dissimilarity Index Scale	
	Minority	Hispanic/Latino	Non-Hispanic Minority	Value Ranges	Interpretation
Salt Lake City	0.50	0.60	0.42	≤ 0.40	Low Segregation
Salt Lake County	0.43	0.50	0.41	0.41-0.54	Moderate Segregation
Midvale	0.40	0.48	0.31	≥ 0.55	High Segregation
Bluffdale	0.35	0.39	0.45		
Draper	0.33	0.39	0.36		
Sandy	0.33	0.44	0.38		
Murray	0.32	0.38	0.37		
Holladay	0.32	0.42	0.36		
Taylorsville	0.31	0.35	0.35		
Riverton	0.30	0.35	0.42		
Cottonwood Heights	0.29	0.40	0.33		
West Valley City	0.29	0.31	0.36		
South Jordan	0.29	0.36	0.37		
West Jordan	0.28	0.33	0.34		
Herriman	0.28	0.36	0.43		
South Salt Lake	0.28	0.32	0.27		

Source: BEBR computations from 2010 Census

The dissimilarity index calculates the share of the minority group that would have to move to different census blocks in order to match the non-Hispanic white distribution in the respective geographic area. The Salt Lake County dissimilarity index was calculated using data from all incorporated cities and unincorporated areas.

The dissimilarity index is calculated as follows:

$$Dissimilarity (W, M)_j = \frac{1}{2} \sum_{i=1}^N \left| \frac{M_i}{M_j} - \frac{W_i}{W_j} \right|$$

where

W = non-Hispanic population

M = minority population

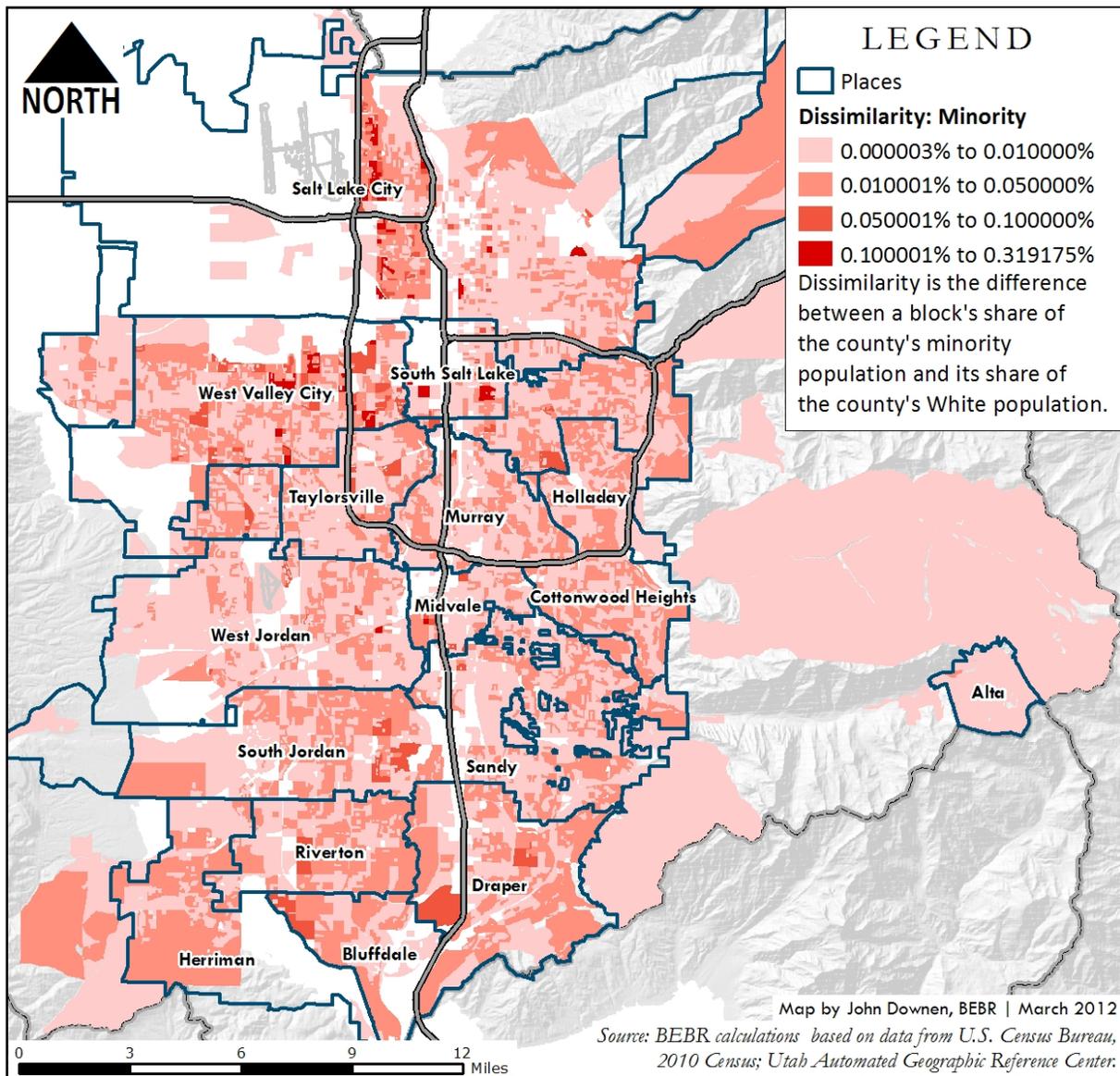
i = ith census block group

j = geographic area (city or county)

N = number of census blocks in geographic area j

Figure 20 shows the absolute difference between each census block's county share of the minority and non-Hispanic white population. These absolute differences are used to calculate the dissimilarity index. Noticeably large dissimilarities between the minority and non-Hispanic white county shares at the block level are concentrated in Salt Lake City's west side River District. Some census blocks in West Valley City and South Salt Lake also have dissimilarities greater than 0.1 percent, as does an area in Draper where the Utah State Prison is located.

Figure 20
 Dissimilarity Index for Minorities in Salt Lake County, 2010



SECTION III RACIALLY CONCENTRATED AREAS OF POVERTY (RCAP) AND ETHNICALLY CONCENTRATED AREAS OF POVERTY (ECAP)

The Fair Housing Equity Assessment must address the presence of racially concentrated areas of poverty (RCAP) and ethnically concentrated areas of poverty (ECAP) in Salt Lake County. In keeping with this requirement the following discussion first reviews poverty conditions, in general, in Salt Lake County, then the discussion narrows to a focus on RCAP and ECAP areas. Once the RCAPs and ECAPs are identified their characteristics are described followed by a discussion of the contributing factors and causes of these concentrations of poverty.

Poverty in Salt Lake County

In 2010, 9.4 percent of Salt Lake County’s population was poor *Table 1*. Approximately 6.8 percent of non-Hispanic whites were poor. Minorities were almost three times as likely to be poor, with a poverty rate of 18.2 percent. Countywide, blacks had the highest prevalence of poverty with just over 22 percent, followed by Hispanics at about 19 percent.

Overall, there was not a minority race or ethnic group in 2010 that did not have a poverty rate of at least 13 percent. Though non-Hispanic whites had the lowest prevalence of poverty, they comprised about 56.2 percent of the total poor population in the county *Table 2*. However, note that the non-Hispanic white share of the poor population is significantly lower than the 74 percent non-Hispanic white share of the total county population.

Poor Hispanics were the second largest poor population at 32.1 percent of the total poor, and almost three quarters of the poor minority population. About 5 percent of the poor populations were Asian, and less than a combined 8 percent were black, Native American, or Pacific Islanders. The racial and ethnic composition of the poor in the context of the entire county population demographics illustrates the disparities in income between the minority and non-minority populations in the county—even though minorities comprised slightly over a quarter of the county’s total population in 2010, they accounted for nearly 44 percent of the total poor in the county.

Table 1
Number and Share of Poor Persons by Race and Ethnicity in Salt Lake County

		Poor	Total	% Poor
Salt Lake County	Black	3123	13987	22.3%
	Native Am.	1364	8117	16.8%
	Asian	4145	31219	13.3%
	Pacific Island	2090	13886	15.1%
	Hispanic	29179	152383	19.1%
	Total Minority	39901	219592	18.2%
	White	51117	753585	6.8%
	Total	91018	973177	9.4%

Source: HUD Spreadsheet for Sustainable Communities Grantees

Table 2
Poor in Salt Lake County by Race and Ethnicity, 2010

	Race/Ethnicity	Persons	Share
Salt Lake County	Black	3123	3.4%
	Native Am.	1364	1.5%
	Asian	4145	4.6%
	Pacific Island	2090	2.3%
	Hispanic	29179	32.1%
	Total Minority	39901	43.8%
	White	51117	56.2%
	Total Poor	91018	100.0%

Source: HUD Spreadsheet for Sustainable Communities Grantees

Though the total percentage of poor people in Salt Lake County was near 10 percent, and about 44 percent of them were minorities, the poor populations varied greatly by city. As shown in *Table 3*,

South Jordan's 1.6 percent poverty rate is the lowest in the county. However, Herriman, not South Jordan, had the lowest minority share of the poor population at only 9.3 percent, most of the poor in South Jordan are white. South Salt Lake had the highest poverty rate of any city, with over 18.3 percent of the population living in poverty. Overall, the northern cities tended to have higher rates of poverty and minority shares of the poor population.

Table 3
Number and Share of Poor Persons in Salt Lake County by City, 2010

	Poor White	Poor Minority	Total Poor	Minority Share of Poor	Total Population	% Poor
Salt Lake County	51,117	39,901	91,018	43.8%	973,177	9.4%
Bluffdale	282	66	348	19.0%	7,413	4.7%
Cottonwood Hts	1,186	630	1,816	34.7%	34,329	5.3%
Draper	1,297	344	1,641	21.0%	33,394	4.9%
Herriman	244	25	269	9.3%	16,046	1.7%
Holladay	1,265	230	1,495	15.4%	24,735	6.0%
Midvale	2,326	2,509	4,835	51.9%	27,350	17.7%
Murray	2,411	998	3,409	29.3%	44,422	7.7%
Riverton	1,243	153	1,396	11.0%	36,283	3.8%
Salt Lake City	15,623	13,462	175,585	46.3%	175,585	16.6%
East Side	12,188	5,876	111,172	32.5%	111,172	16.2%
West Side	3,435	7,586	64,413	68.8%	64,413	17.1%
Sandy	3,852	1,494	5,346	27.9%	93,831	5.7%
South Jordan	645	95	740	12.8%	46,946	1.6%
South Salt Lake	1,841	2,478	4,319	57.4%	23,617	18.3%
Taylorville	3,044	2,392	5,436	44.0%	57,008	9.5%
West Jordan	3,149	2,433	5,582	43.6%	99,696	5.6%
West Valley City	5,024	7,763	12,787	60.7%	119,782	10.7%

Source: HUD Spreadsheet for Sustainable Communities Grantees

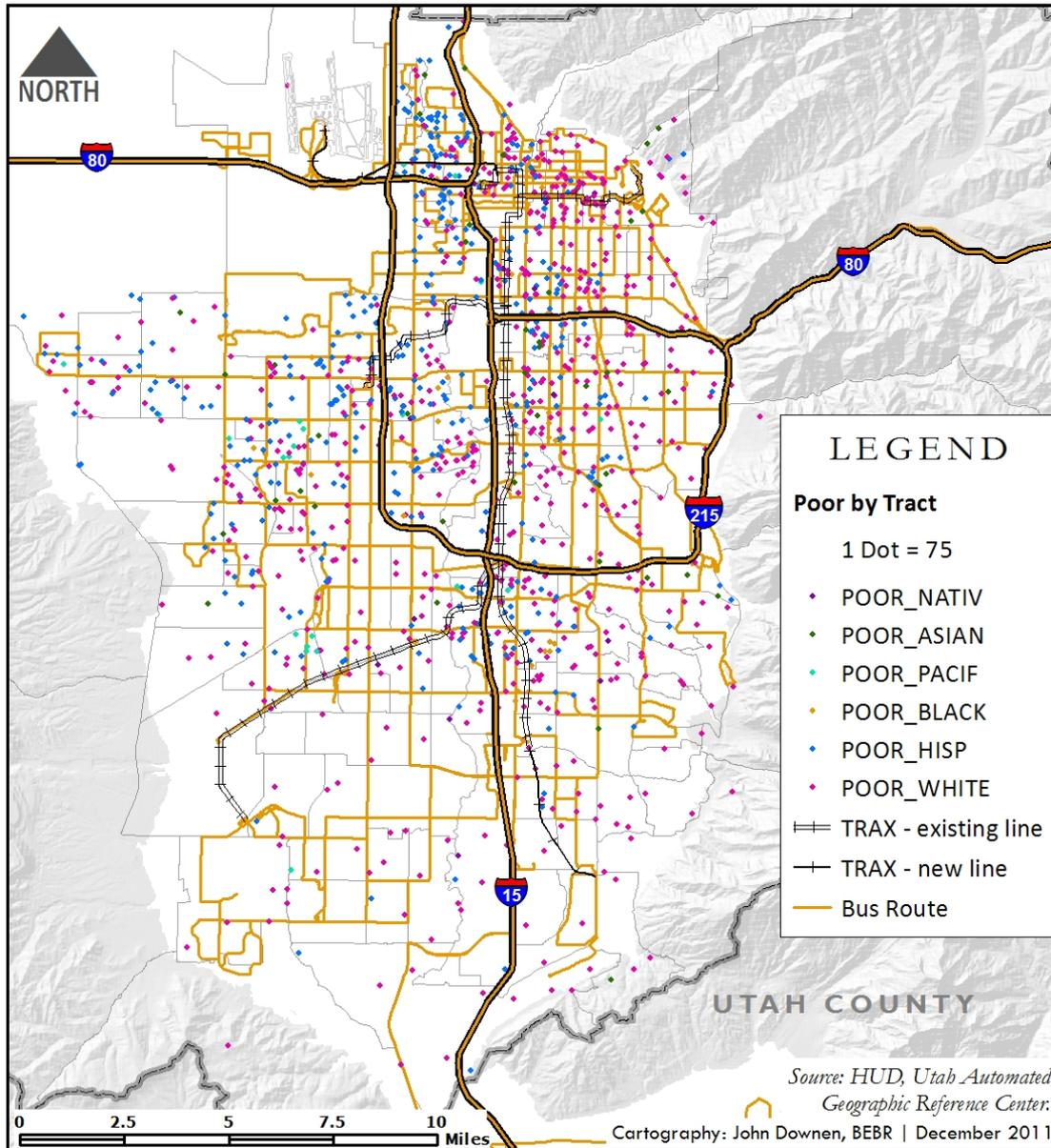
Figure 1 maps the geographical location of poor residents living in Salt Lake County by race and ethnicity in 2010. There are much larger concentrations of poor individuals living in the northern and central cities, especially around the downtown area of Salt Lake City. However, more toward the central parts of the valley, concentrations of poor residents tend to shift west into West Valley City, Taylorville, and Kearns. There is also a larger cluster of poor residents near the intersection of Interstates 15 and 215, in Midvale and the northern tip of Sandy.

Unlike the northwest quadrant of the county, the majority of the poor population in the extreme southern portion of the county, cities like Herriman and Draper, are white non-Hispanic. The poor minorities of the county tend to live on the west side of I-15 and are more heavily concentrated in the northwest quadrant. This concentration reflects, in part, higher home prices on the east side of the county, fewer transportation options in the southeastern cities, distance and location of employment centers and major commercial areas with low-wage jobs, and less access to necessary services and amenities like childcare.

For the most part, the densest concentrations of poor residents are in more centralized locations with more public transportation options; the same is true of minority populations. Overall, fewer poor people live in the eastern and southern regions of the county, which have census tracts with higher opportunity indices. The poor populations that do tend to populate these areas are disproportionately non-Hispanic whites. Even

within the low-income populations of Salt Lake County, patterns of racial and ethnic segregation still exist. Poor whites are more likely to live in the eastern and southern sections of the county, while poor minorities are more likely to live in the western and northern sections of the county.

Figure 1
Poor Individuals by Census Tract Salt Lake County, 2010



Increasing concentrations of low-income and poverty households are linked to racial and ethnic segregation. “The face of poverty is also the face of segregation.” And low-incomes impede fair housing choice and raise the risk of housing discrimination. HUD has placed heavy emphasis in the Fair Housing Equity Assessment on the racial and ethnic concentrations of poverty. The consequences of poverty are particularly harmful to children. Children who grow up in densely poor neighborhoods and attend low-income schools face many barriers to academic and occupational

achievement. Such children are more likely to drop out of high school and become pregnant as teenagers. Their neighborhoods have higher crime rates and higher incidence of health disparities, again affecting opportunities.

RCAP and ECAP areas in Salt Lake County

HUD defines a racially/ethnically concentrated area of poverty as a census tract where the number of families in poverty is equal to, or greater than, 40 percent of all families, or an overall family poverty rate equal to, or greater than, three times the metropolitan poverty rate, and a non-white population, measured at greater than 50 percent of the population.

Poverty Rate Three Times County Average and Minority Major Tracts – *Figure 2* show concentrations of poverty in Salt Lake County, estimated from the 2007-2011 American Community Survey. In this figure, an area of poverty is considered concentrated when its share of poverty is three times the countywide share of poverty. The countywide average is 11.6 percent, so an area is considered highly concentrated when it has 34.8 percent or more of the population living in poverty. *Figure 2* overlays these areas of poverty with census tracts that have a minority-majority population. The vast majority of these tracts are located in the northwest quadrant of the county, mostly on the west side of Salt Lake City and West Valley City. However, there are also minority-majority tracts in South Salt Lake, Midvale, and Sandy. None of these tracts with a minority-majority have a poverty share greater, or equal to, 34.8 percent. Nevertheless, they are areas with a high concentration of poor minority residents and are at risk of becoming RCAPs. Similarly, the northwestern portion of Salt Lake City, along the River District, is also a high concentration of minority-majority tracts but none satisfy the poverty level requirement.

Figure 3 overlays the concentrations of poverty with tracts that have a Hispanic population of 10 percentage points, or more, above the 17.1 percent Hispanic share of county's population. For the most part, these tracts are the same as those with a minority-majority population. The additional tracts that have high concentrations of Hispanics include the northwestern tracts of Salt Lake County, almost all of West Valley City and Kearns Township, additional tracts in South Salt Lake, Taylorsville, and Midvale. Some tracts around the downtown area of Salt Lake City also have significant concentrations of Hispanic residents, as well as the concentrated area of poverty northeast of the I-80 and I-15 intersection. Not surprisingly, these tracts also have high concentrations of poor residents and minority households. There is a single tract at the south end of Salt Lake City that satisfies the criteria for an ECAP of three times the poverty rate and a concentration of ethnic population greater than 10 percent above the countywide average of 17.1 percent.

Figure 2
Concentrations of Poverty and Minority-Majority by Tract in Salt Lake County, 2007-2011

(Poverty Rate Three Times County Average)

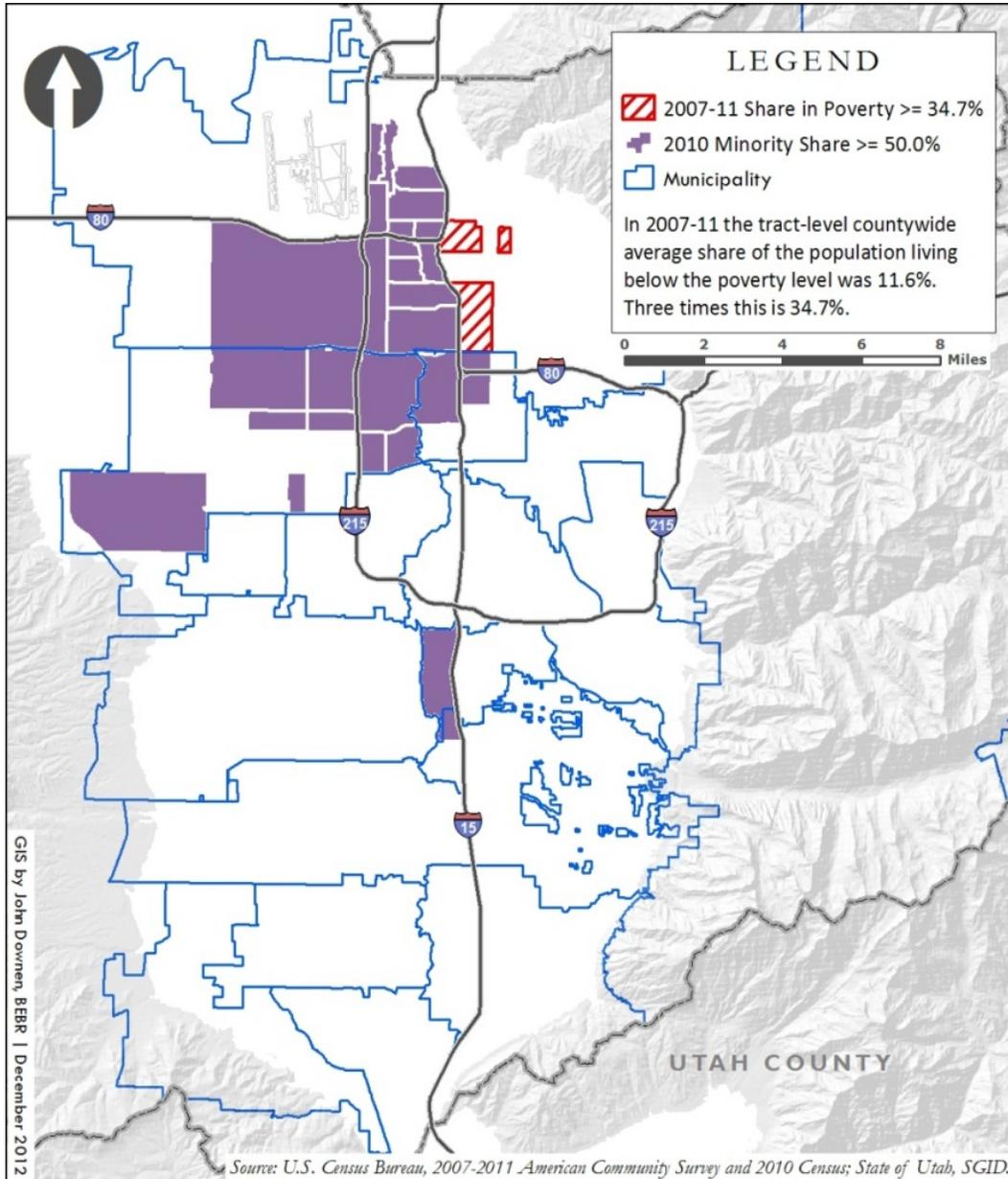
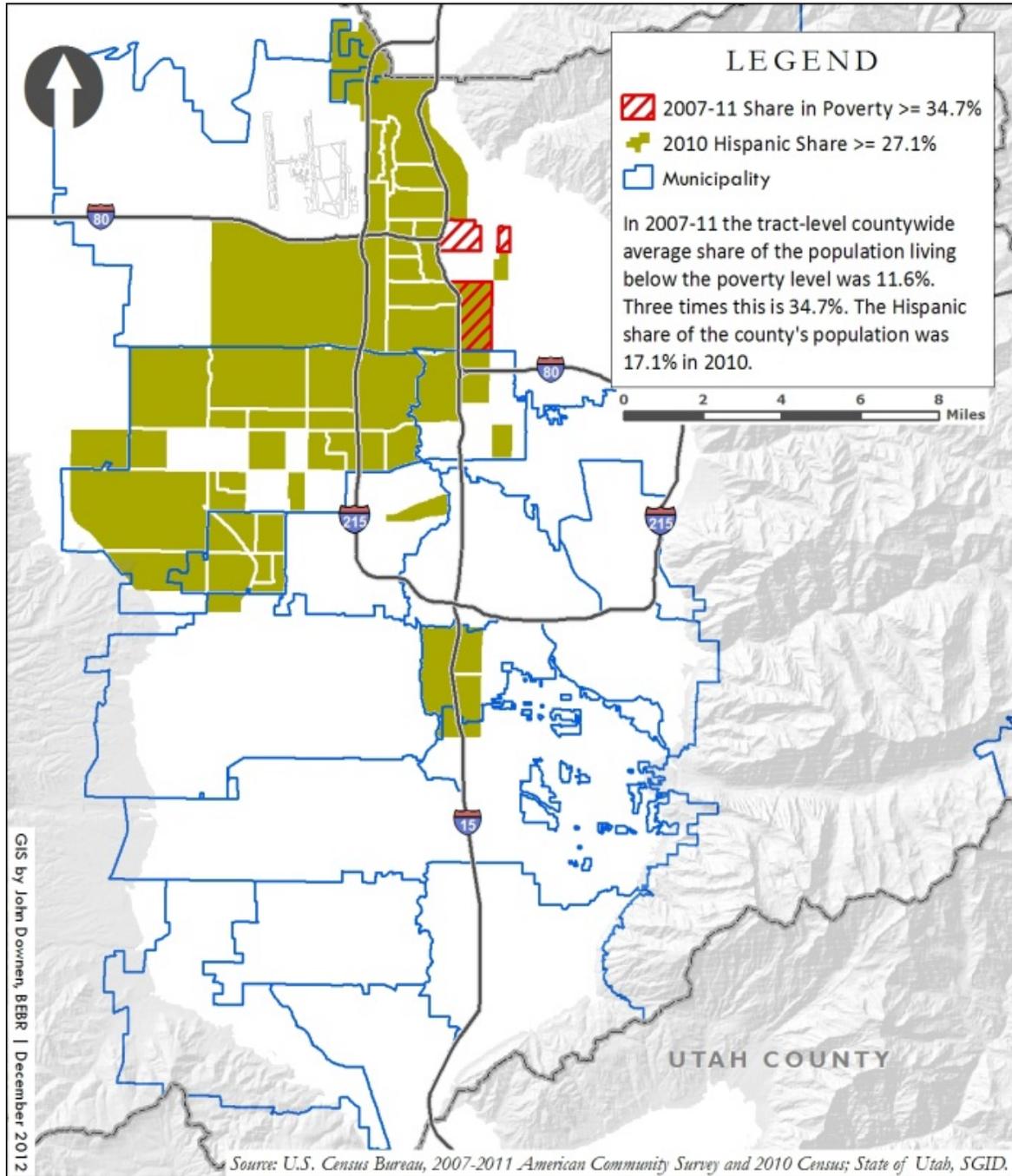


Figure 3
 Concentrations of Poverty and Hispanics by Tract in Salt Lake County, 2007–2011



Renters in near RCAP and ECAP Census Tracts – Salt Lake County’s near RCAPs and ECAPs are characterized by extremely high rates of renter-occupied housing. Renter occupied housing has a much higher likelihood of concentrations of low-income, minority renters. The dominance of rental housing in some of the census tracts is striking. For instance, in census tract 1021 there were 953 occupied housing units, 93 percent of which were renter-occupied units *Table 4*.

**Table 4
Near RCAP and ECAP Census Tracts
Percent of Renter Occupied Units**

Census Tract	Occupied Units	Renter Occupied	% Renter Occupied
200 E to 400 E, South Temple to 400 S			
1025	1,650	1,447	87.7%
200 W to I-15, 400 S to North Temple			
1021	953	885	92.9%
1700 W to I-15, 700 N to 900 S			
1006	2,085	839	40.2%
1026	1,267	563	44.4%
1027.1	1,590	739	46.5%
1027.2	1,074	581	54.1%
Total	6,016	2,722	45.2%
I-15 to State Street, 900 South 2100 South			
1029	2,014	1,524	75.7%
Jordan River to 1300 W, 4100 S to 4600 S			
1135.1	1,710	1,216	71.1%

Source: U.S. Census Bureau.

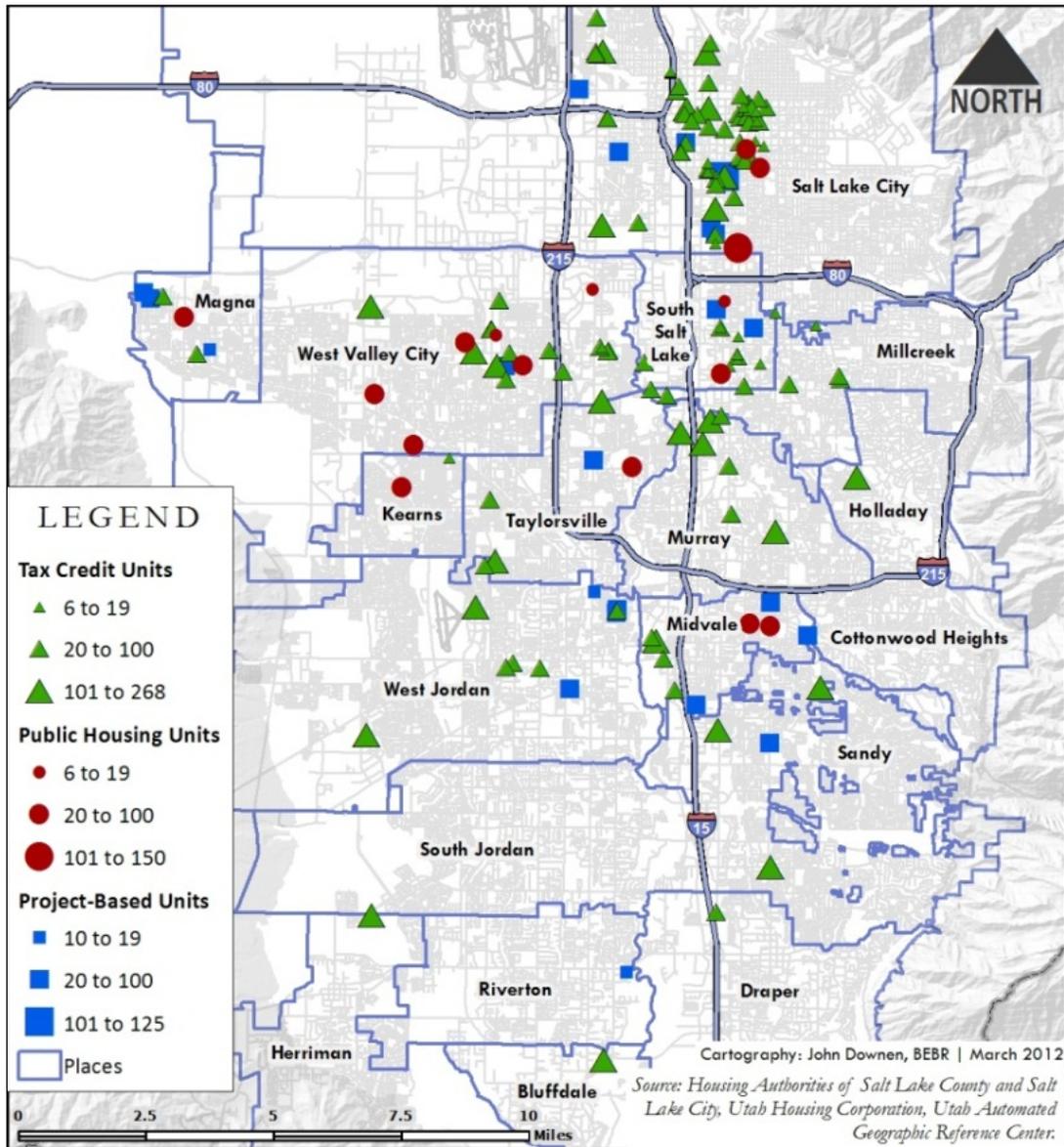
Siting of Rent-Assisted Apartment Communities

Siting practices of rent-assisted apartments plays a strong role in the geographic concentration of very low-income households. In Salt Lake County, there are three main types of subsidized apartment projects—tax credit units, public housing units, and project-based units—each of which provide affordable housing options to low-income, minority, and other residents of protected classes. A majority of the subsidized projects are in the northern half of the county, along the central I-15 corridor *Figure 4*. Of the 9,100 tax credit units in Salt Lake County 4,500 are located in Salt Lake City.

In addition, countywide rent assisted communities are more likely to be located west of I-15. Many of these projects are located in lower opportunity cities in the central and west side neighborhoods, thus leading to high rates of concentration of low-income minority renters.

The densest concentration of subsidized units is near the Salt Lake City downtown area. There is also a group of rent-assisted projects in northwest Murray. The number of subsidized housing projects decreases rapidly as one moves south in the county with many southern cities having only one project. Rent-assisted projects are targeted toward members of the protected classes, the concentration of projects in low-opportunity areas contributes to, and reinforces, the existing segregation in the county. Years of continued siting of rent-assisted projects in the same geographic areas of the county have led to concentrations of low-income minority renter households. Although these areas of concentration do not presently qualify as RCAPs or ECAPs without a shift in public policy and siting of projects some census tracts could reach the RCAP and ECAP thresholds.

Figure 4
Rent Assisted Apartment Projects in Salt Lake County, 2011



Section 8 Vouchers and Concentrations of Poverty

The rental choices of Section 8 Voucher holders can be an extremely effective tool in reducing the geographic concentrations of low-income households. This was the intent of the voucher choice program (Section 8) introduced in 1974, which complements the project based voucher program. The Housing Choice Voucher (Section 8) program, as the name implies gives a renter the choice of any rental unit in the market whether rent-assisted or market rate. The voucher holder is obligated to pay 30 percent of his/her income for rent and utilities and the difference between this amount and HUD’s Fair Market Rent (FMR) is the tenant’s subsidy. It is important to note that a voucher holder is not restricted to rent-assisted low-income housing. This feature allows greater dispersion of low-income voucher holders since they can live in any rental property where rent is below the FMR. And the FMRs are sufficiently high that voucher holder has rental choices across a broader geographic

area. The FMR in Salt Lake County for a three bedroom unit is about \$1,100, for a two bedroom unit about \$800.

However, voucher holders can be discriminated against by landlords unwilling to accept Section 8 Vouchers. Some landlords are very reluctant to accept vouchers because they want no part of a federal program, or fear that voucher holders will not maintain the property. The Utah Fair Housing Law makes it illegal for a landlord to discriminate against a prospective tenant due to “source of income.” This provision offers some protection for voucher holders but is difficult to enforce.

The following two figures map the location of Section 8 Voucher holders in Salt Lake County *Figures 5 and 6*. Not surprisingly, the majority of the vouchers are used in the central to northern portion of the county, closer to more transportation options and downtown Salt Lake City. The dispersion of Section 8 households is a bit more even than the geographic distribution of either subsidized housing projects or minorities and aligns fairly closely with the general distribution of poor residents in the county. The west side vouchers are more dispersed across the cities, especially West Valley City, Kearns, and Taylorsville, and less concentrated than on the east side. On the east side of I-15, the densest concentrations of vouchers are along the north-and-south-running bus routes that connect to Salt Lake City, South Salt Lake, Millcreek, and Murray. Similarly, there are dense concentrations on the east side of Salt Lake City, in Midvale, and sparsely dispersed in Sandy. Overall, Section 8 Voucher holders have greater housing choice in higher-opportunity areas than do low-income, non-voucher households.

Figure 5 overlays the Section 8 Voucher locations with the minority share of the population by census tract. Census tracts with higher percentages of minority residents also tend to have higher numbers of Section 8 Vouchers.

Figure 6 overlays the location of Section 8 Vouchers in the county on tracts representing the number of low-wages jobs available in 2010. Surprisingly, a large majority of the vouchers holders are in tracts with relatively few low-wage jobs. Instead, they are located in less commercial tracts, most likely in more predominately residential neighborhoods. As a result, it is likely they have to rely on the public transit system in the county for job opportunities. The prevalence of Section 8 Vouchers in more residential neighborhoods, away from the commercial centers in the valley could also indicate a desire for low-income households to live in these areas, potentially for better schooling and housing opportunities, as well as a lower rate of poverty. In fact, relatively few vouchers are used in the tracts with the highest number of low-wage jobs in Salt Lake City, West Valley City, and even Draper. This is likely due to few housing opportunities in these more commercial areas.

Figure 5
Section 8 Vouchers and Minority Population Share in Salt Lake County

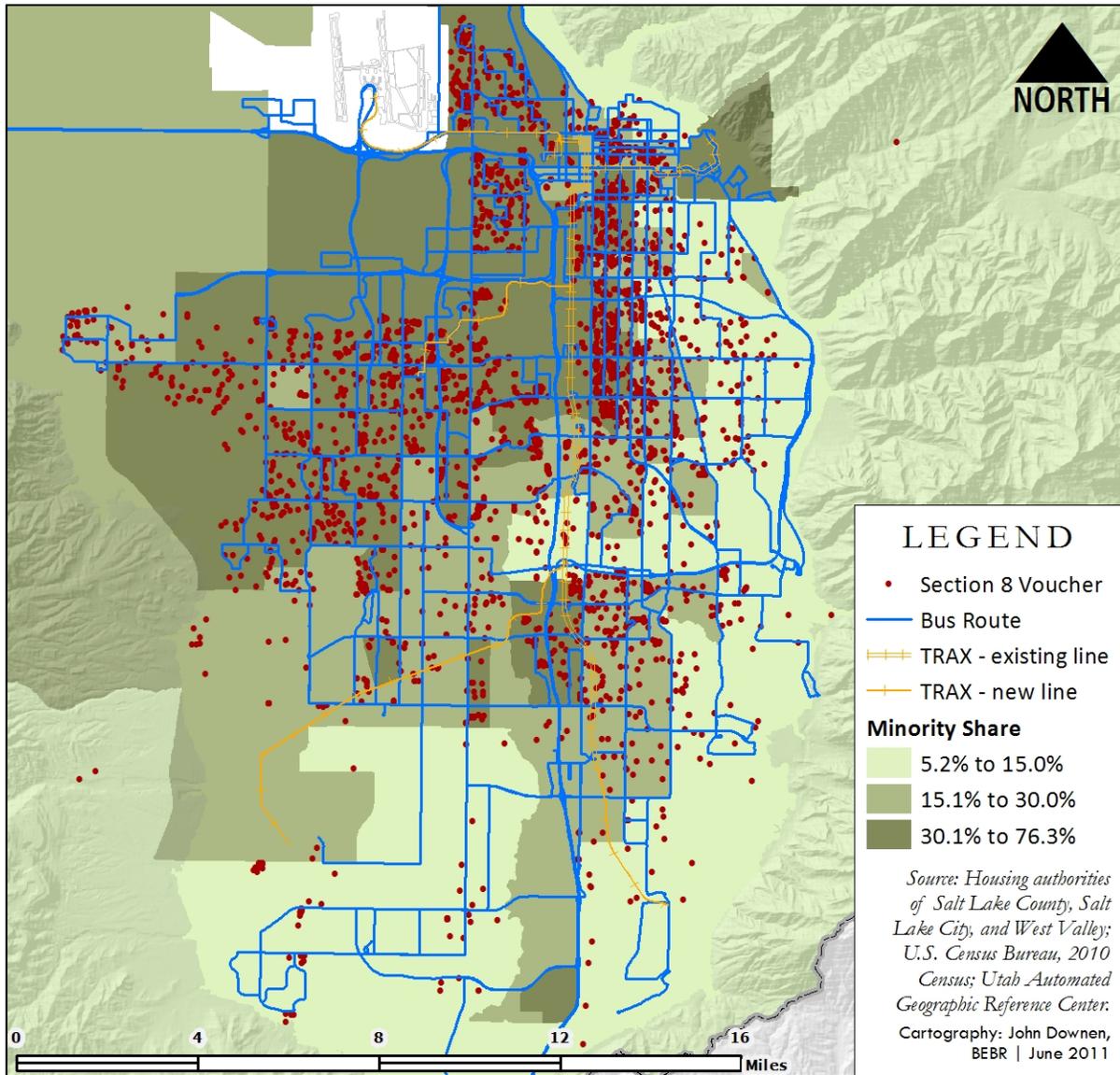
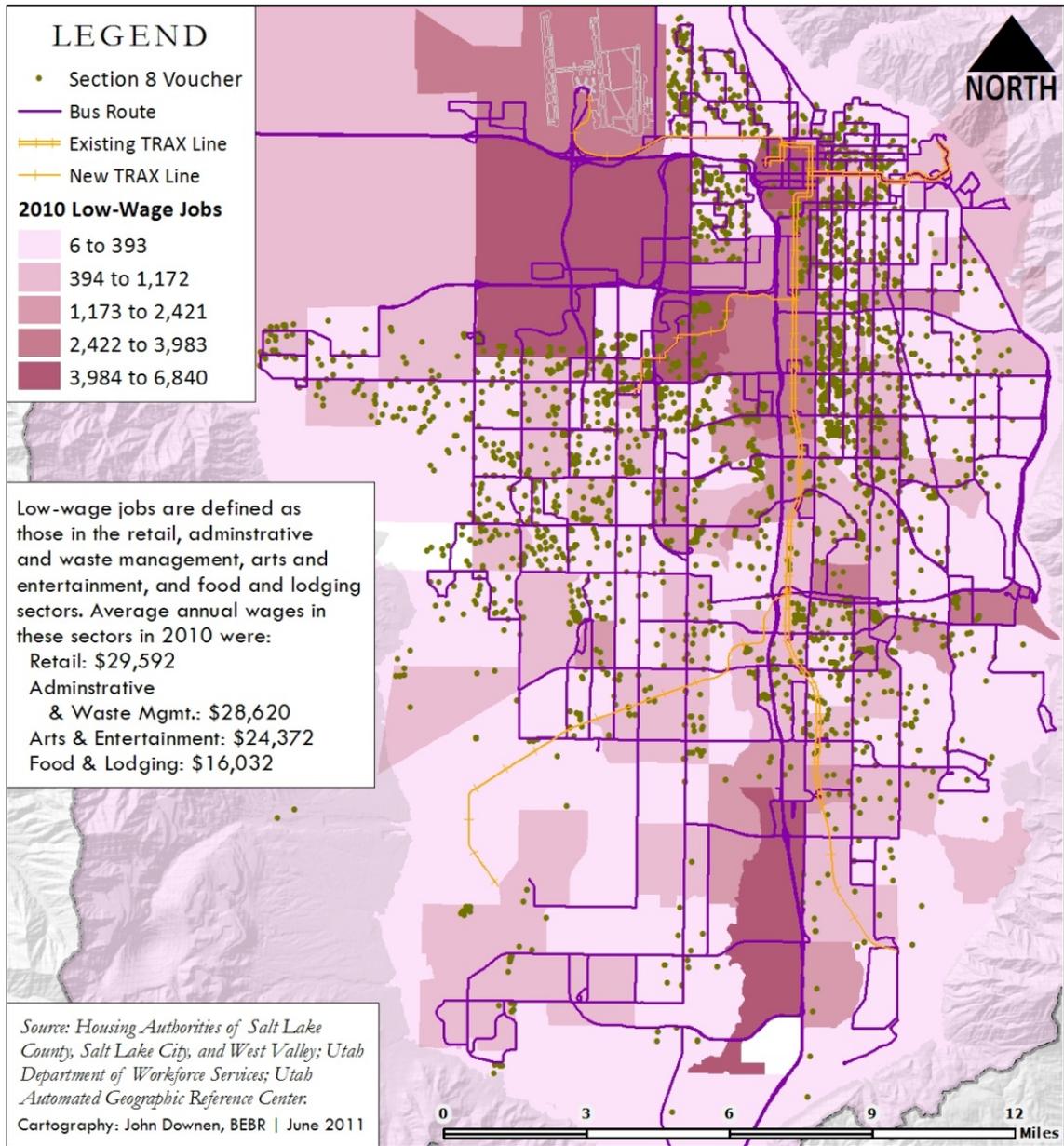


Figure 6
Section 8 Voucher Holders and Low-Wage Jobs in Salt Lake County



SECTION IV DISPARITIES IN OPPORTUNITY

Introduction

The objective of this section of the FHEA is best expressed in the following quote from HUD Secretary Shaun Donovan. *Sustainability also means creating “geographies of opportunity,” places that effectively connect people to jobs, quality public schools, and other amenities. Today too many HUD-assisted families are stuck in neighborhoods of concentrated poverty and segregation, where one’s zip code predicts poor education, employment, and even health outcomes. These neighborhoods are not sustainable in their present state.*

The data, tables, and figures in this section provide current and historical context for evaluating equity and opportunity in the cities and neighborhoods of Salt Lake County. Ultimately, the information developed in the FHEA regarding neighborhood disparities in opportunity will be integrated into the community development strategy to enhance equity and opportunity.

Opportunity Index

HUD provided an opportunity index to quantify the number of important liabilities and assets that influence the ability of an individual, or family, to access and capitalize on opportunity. HUD created five indices; school proficiency, poverty, labor market, housing stability, and job access. With these five measures, a single index score, or composite score, for opportunity was calculated for each census tract by HUD. Using the census tract data BEBR created an average opportunity score and scores for all opportunity dimensions for the county and each city. These scores were calculated at the city level by weighting of census tract population.

Table 1
Weighted, Standardized Opportunity Index
(1 = low 10 = high)

	School Proficiency	Job Access	Labor Market Engagement	Poverty	Housing Stability	Opportunity
Salt Lake County	4.3	5.4	5.0	4.9	5.3	4.9
Salt Lake City	4.5	6.5	5.4	3.7	4.7	4.9
East Side	5.8	6.5	6.7	4.2	6.2	6.3
West Side	2.3	6.5	3.0	2.9	2.3	2.5
Bluffdale	4.0	2.0	4.0	6.0	3.0	3.0
Cottonwood Heights	7.7	5.5	6.6	5.9	6.6	7.5
Draper	8.2	5.2	7.3	6.1	6.5	7.7
Herriman	5.0	1.0	8.0	7.0	8.0	6.0
Holladay	9.0	5.4	5.9	5.4	6.6	7.3
Midvale	1.6	8.3	3.2	3.1	4.5	3.1
Murray	5.2	8.3	4.8	4.6	5.8	5.9
Riverton	5.5	3.0	5.3	6.1	7.9	5.7
Sandy	6.2	4.9	6.3	6.3	7.4	7.0
South Jordan	7.8	4.1	6.0	8.5	7.6	8.0
South Salt Lake	1.5	8.5	2.5	1.6	2.5	1.5
Taylorsville	2.4	5.4	3.6	4.3	4.9	3.3
West Jordan	2.7	4.4	5.4	6.0	5.8	4.5
West Valley City	1.6	5.4	3.1	3.8	2.5	2.0
Unincorporated Salt Lake County	3.6	4.9	4.4	4.5	4.5	4.0

Source: HUD Spreadsheet for Sustainable Communities grantees.

The overall average opportunity score in Salt Lake County was 4.9, on a scale from 1 to 10. Although the county average was near the middle of the opportunity index scale, the cities in the

county varied greatly. As shown in *Table 1*, the city-level opportunity scores ranged from as low as 1.5 in South Salt Lake to as high as 8.0 in South Jordan. Based on HUD’s opportunity index there are five low opportunity, four moderate opportunity, and six high opportunity cities in the county *Table 2*.

Table 2
Low, Moderate and High Opportunity Cities
 (1 = low 10 = high)

Low Opportunity	Opportunity Index	Moderate Opportunity	Opportunity Index	High Opportunity	Opportunity Index
South Salt Lake	1.5	West Jordan	4.5	Herriman	6.0
West Valley City	2.0	Salt Lake City	4.9	Sandy	7.0
Bluffdale	3.0	Riverton	5.7	Holladay	7.3
Midvale	3.1	Murray	5.9	Cottonwood Heights	7.5
Taylorsville	3.3			Draper	7.7
				South Jordan	8.0

Source: HUD Spreadsheet for Sustainable Communities grantees.

The HUD opportunity scores are mapped in *Figures 1 and 2*. *Figure 1* maps the HUD Opportunity Index score for each census tract in Salt Lake County, whereas *Figure 2* maps the aggregate score for each city in the county. The census tract map tells a more detailed story of opportunity, and shows the areas within a city that lack access to opportunity. This neighborhood detail is not captured in the city map.

The two maps highlight clear differences in opportunities for residents on the east side versus west side. Overall, the west side cities and tracts have lower access to opportunity than the east side cities. In fact, the only city to score above a 6.0 on the west side is the city of South Jordan. Using only the *tract* data the tracts on the west side of the county that scored a 9.0 or above were South Jordan, and a sliver of West Jordan and Bluffdale. The largest disparity is between the mid-valley west region and the southeastern region, with opportunity scores ranging from 2.0 in West Valley City to 7.7 in Draper.

Not surprisingly, the lowest opportunity tracts and cities are those with high rates of poverty and high concentrations of minority renters; the cities of West Valley City, Taylorsville, South Salt Lake, and the west side of Salt Lake City. These tracts and cities also have high Hispanic and minority concentrations. On the other hand, the east side cities, especially in the south are relatively more affluent and dominated demographically by non-Hispanic whites.

Figure 1
Opportunity Index by Census Tract in Salt Lake County
 (1-2 opportunity poor to 9-10 opportunity rich)

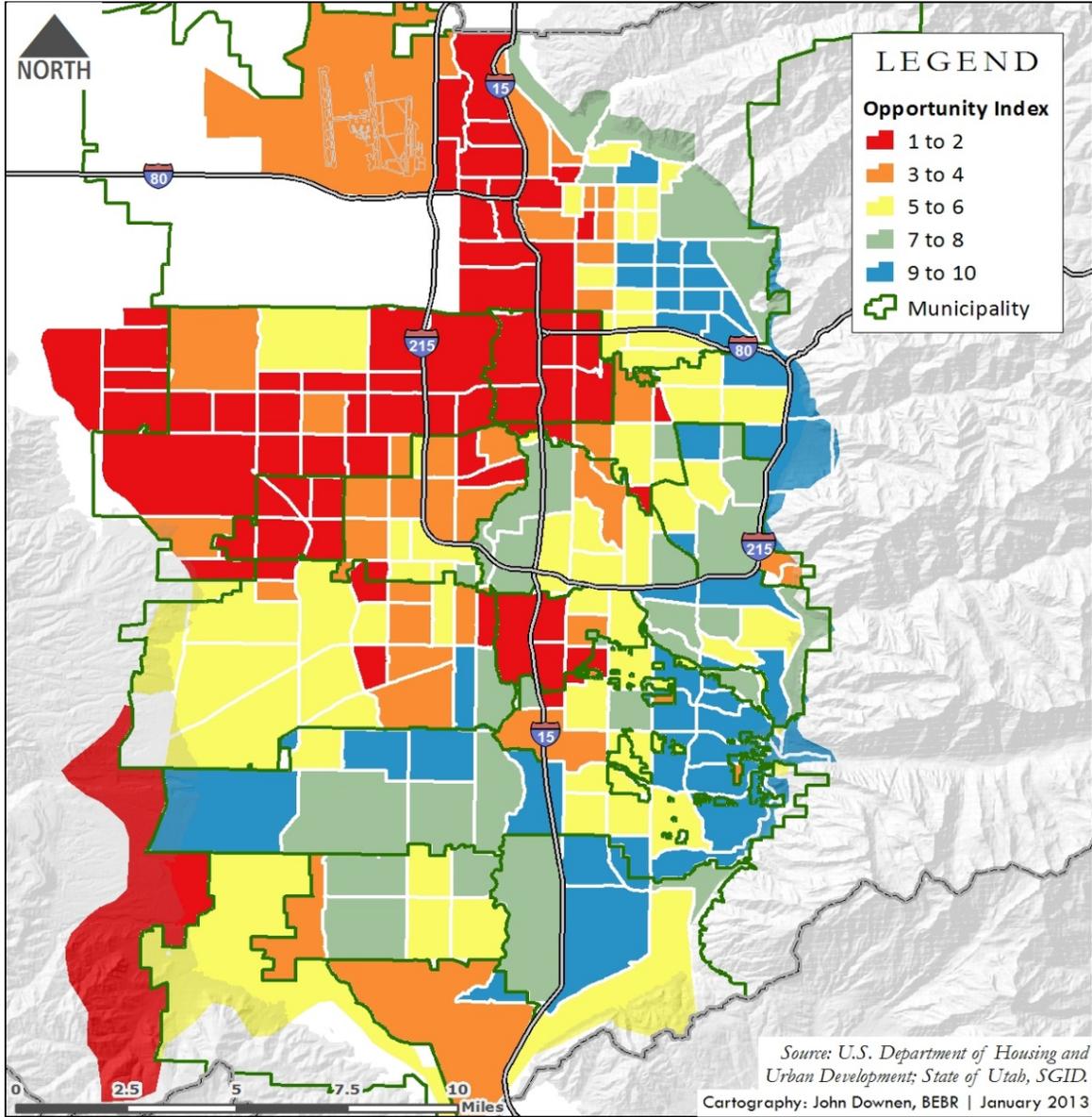
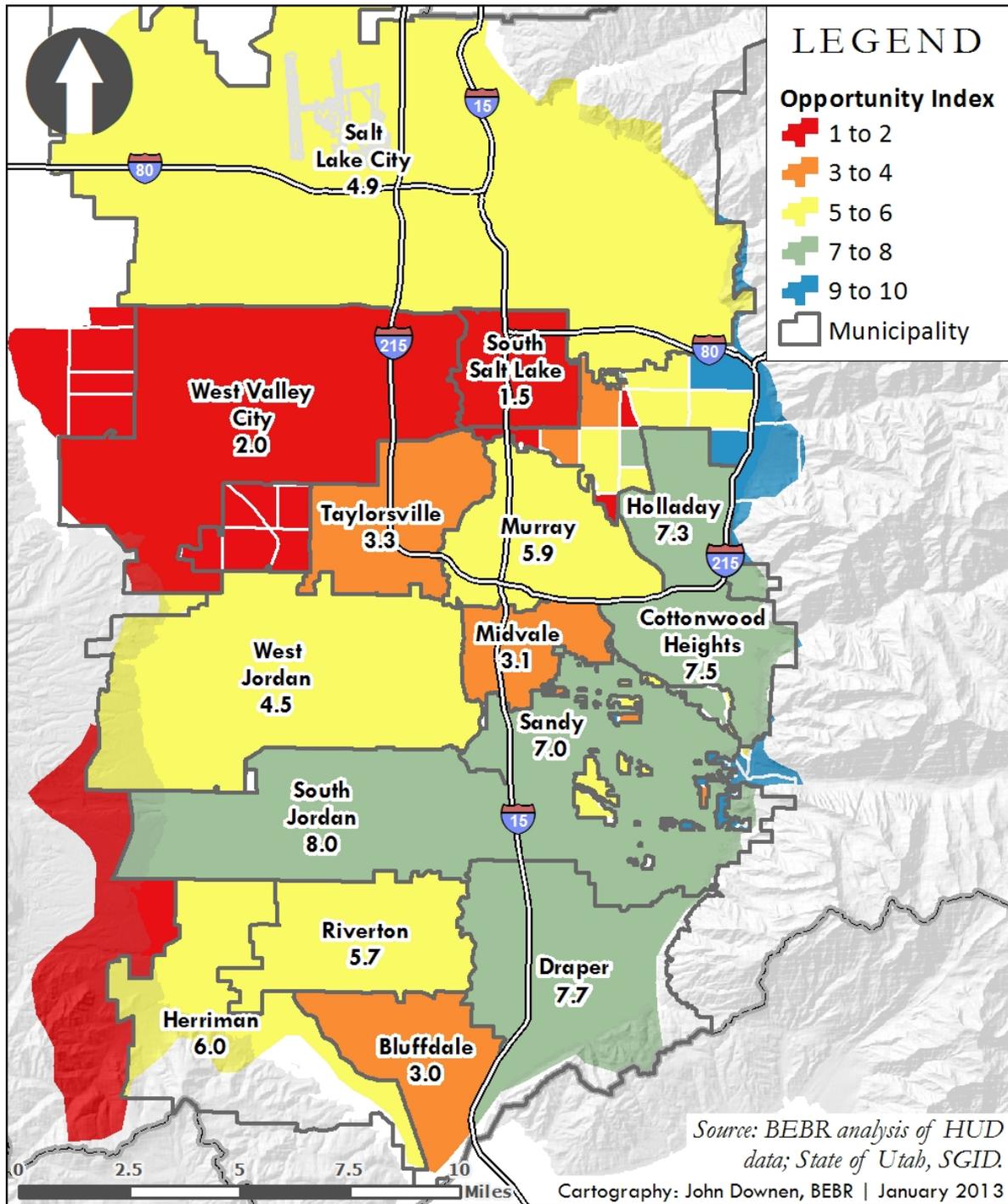


Figure 2
 Opportunity Index by City and Unincorporated Tract in Salt Lake County



Cities have been ranked by each opportunity dimensions in *Tables 3 and 4*. Those cities ranking in the bottom quartile are shaded. These cities have the lowest scores in the particular dimension. Salt Lake City's west side, South Salt Lake, and West Valley City all rank in the bottom quartile in five of the six dimensions. Midvale ranks in the bottom quartile in four dimensions.

Table 3
Ranking of Cities by Opportunity Composite, Job Access
and Labor Market Attachment

Composite Opportunity	Index	Job Access	Index	Labor Market Attachment	
South Jordan	8.0	South Salt Lake	8.5	Herriman	8.0
Draper	7.7	Midvale	8.3	Draper	7.3
Cottonwood Hts.	7.5	Murray	8.3	SLC East Side	6.7
Holladay	7.3	Salt Lake City	6.5	Cottonwood Heights	6.6
Sandy	7.0	SLC East Side	6.5	Sandy	6.3
SLC East Side	6.3	SLC West Side	6.5	South Jordan	6.0
Herriman	6.0	Cottonwood Hts	5.5	Holladay	5.9
Murray	5.9	Salt Lake County	5.4	Salt Lake City	5.4
Riverton	5.7	Holladay	5.4	West Jordan	5.4
Salt Lake County	4.9	Taylorsville	5.4	Riverton	5.3
Salt Lake City	4.9	West Valley City	5.4	Salt Lake County	5.0
West Jordan	4.5	Draper	5.2	Murray	4.8
Uninc. SL County	4.0	Sandy	4.9	Uninc. SL County	4.4
Taylorsville	3.3	Uninc. SL County	4.9	Bluffdale	4.0
Midvale	3.1	West Jordan	4.4	Taylorsville	3.6
Bluffdale	3.0	South Jordan	4.1	Midvale	3.2
SLC West Side	2.5	Riverton	3.0	West Valley City	3.1
West Valley City	2.0	Bluffdale	2.0	SLC West Side	3.0
South Salt Lake	1.5	Herriman	1.0	South Salt Lake	2.5

Source: Derived from HUD Spreadsheet for Sustainable Communities Grantees.

Table 4
Ranking of Cities by School Proficiency, Poverty and Housing Stability

School Proficiency		Poverty		Housing Stability	
Holladay	9.0	South Jordan	8.5	Herriman	8.0
Draper	8.2	Herriman	7.0	Riverton	7.9
South Jordan	7.8	Sandy	6.3	South Jordan	7.6
Cottonwood Heights	7.7	Draper	6.1	Sandy	7.4
Sandy	6.2	Riverton	6.1	Cottonwood Heights	6.6
SLC East Side	5.8	Bluffdale	6.0	Holladay	6.6
Riverton	5.5	West Jordan	6.0	Draper	6.5
Murray	5.2	Cottonwood Hts.	5.9	SLC East Side	6.2
Herriman	5.0	Holladay	5.4	Murray	5.8
Salt Lake City	4.5	Salt Lake County	4.9	West Jordan	5.8
Salt Lake County	4.3	Murray	4.6	Salt Lake County	5.3
Bluffdale	4.0	Uninc. SL Co.	4.5	Taylorsville	4.9
Uninc. SL County	3.6	Taylorsville	4.3	Salt Lake City	4.7
West Jordan	2.7	SLC East Side	4.2	Midvale	4.5
Taylorsville	2.4	West Valley City	3.8	Uninc. SL Co	4.5
SLC West Side	2.3	Salt Lake City	3.7	Bluffdale	3.0
Midvale	1.6	Midvale	3.1	South Salt Lake	2.5
West Valley City	1.6	SLC West Side	2.9	West Valley City	2.5
South Salt Lake	1.5	South Salt Lake	1.6	SLC West Side	2.3

Source: Derived from HUD Spreadsheet for Sustainable Communities Grantees.

Documentation of Opportunity Index – Within each dimension there are several subcategories to capture various elements of the opportunity dimension. These are summarized in *Table 5*.

Table 5
Opportunity Dimensions: Variables and Sources

Dimension	Variables	Source
Poverty Index	Family Poverty Rates	ACS 2005-2009
School Proficiency Index	Pct. Households Receiving Public Assistance	ACS 2005-2009
	School Math Proficiency/State Math Proficiency	Dept. of Education
Labor Market Engagement	School Reading Proficiency/State Reading Proficiency	Dept. of Education
	Unemployment Rate	ACS 2005-2009
Job Access Index	Labor Force Participation Rate	ACS 2005-2009
	Pct. With a Bachelor's Degree or higher	ACS 2005-2009
	Tract-level Job Counts	LEHD, 2009
Housing Stability Index	Tract-level Job Worker Counts	LEHD, 2009
	Origin-Destination Flows	LEHD, 2009
	Aggregate Commute Time	ACS 2005-2009
	Tract-Tract Average Commute Time	CTPP 2000
	Homeownership Rate	ACS 2005-2009
Neighborhood Health Access Index	Pct. Loans Low-Cost (Re-Fi)	HMDA 2009
	Pct. Loans Low-Cost (New Purchases)	HMDA 2009
	Pct. Vacant (Non-Seasonal)	ACS 2005-2009
	Pct. Crowded	ACS 2005-2009
	Health Professional Shortage Areas	HRSA, HHS 2010

Source: HUD documentation for Sustainable Communities Grantees.

Opportunity by Minority, Hispanics, and Non-Hispanic Whites – The disparity in opportunity for protected classes is dramatically revealed by the share of population groups relegated to low-opportunity areas, i.e. those areas with an opportunity index ranging from one to two *Table 6*. About thirty percent of the total population lives in areas with the lowest opportunity index of 1-2. However, for the Hispanic population 60 percent live in opportunity-poor areas while 54 percent of all minorities (including Hispanics) live in opportunity-poor areas, and 22 percent of whites (non-Hispanic). Less than 5 percent of Hispanics live in opportunity-rich areas.

Table 6
Opportunity by Population Group

Opportunity Index Score	Total Population		Hispanics		Nonwhite		White Non-Hispanic	
	Number	Share	Number	Share	Number	Share	Number	Share
1–2	296,481	29.6%	93,145	60.0%	128,162	54.0%	168,319	22.1%
3–4	155,687	15.6%	24,287	15.7%	37,193	15.7%	118,494	15.5%
5–6	261,502	26.1%	23,767	15.3%	39,923	16.8%	221,579	29.1%
7–8	123,761	12.4%	6,778	4.4%	15,646	6.6%	108,115	14.2%
9–10	162,868	16.3%	7,151	4.6%	16,627	7.0%	146,241	19.2%
Totals	1,000,299	100%	155,128	100%	237,551	100%	762,748	100.0%

Source: HUD Spreadsheet for Sustainable Communities Grantees.

Access to Transportation Network

HUD considers access to the transportation network, particularly public transportation, integral to fair housing choice and access opportunity. Protected classes are less likely to have reliable private transportation and therefore are more likely to be transit-dependent. It is crucial that public investment in transportation systems take account of low, very low, and extremely low-income households. These households represent 40 percent of all households in the county and they are much more likely to be households of protected classes and have greater need for public transportation.

As several maps in this and other sections have shown the spatial distribution of minorities, the disabled, single-parents, renters, large renter households and the poor are disproportionately located in west Salt Lake City, South Salt Lake, West Valley City, Kearns, and Magna. The transportation network serves the first two cities, and parts of West Valley City, well. Protected classes in Salt Lake City are generally within reasonable access of public transportation. The new North Temple TRAX line opens up northwest Salt Lake City to improved access to employment with low-wage and entry-level employment. However in West Valley City, Taylorsville, and areas of unincorporated Salt Lake County access is problematic. A look at *Figure 3* shows that many Section 8 Voucher holders—a group very likely in need of public transportation—live well south and southwest of the TRAX station at 2700 West and 3500 South. The Section 8 Voucher holders are all low-income renter households.

The Mid-Jordan line running southwest from Fashion Place Mall (6200 South) to Daybreak (11400 South) opened in August 2011 serves a rapidly growing residential area but, an area with relatively few low-income households and protected classes. As the map shows, there are only a handful of Section 8 Voucher holders along the Mid-Jordan line. Ridership on the Mid-Jordan line has not reached the anticipated levels. At last report ridership was only about two-thirds of projected ridership. Most of the households served by this line have at least median income and have higher rates of car ownership. But if the jurisdictions of South Jordan, Riverton, Herriman, and Bluffdale allow the development of more affordable renter and owner housing this line's ridership will grow with service to a high priority transit dependent population.

Housing Values and Proximity to Employment Centers - The assessed home values in the county from 2011 are overlaid on census tracts with a high number of low-wage jobs *Figure 4*. This map depicts the proximity of affordable home values for lower-income and minority residents and their access to employment job centers. There are significant numbers of affordable single-family homes in Salt Lake City with reasonable transportation access to high employment centers in the Salt Lake Central Business District, Salt Lake International Airport, and the University of Utah Hospital. TRAX services is excellent from central city to these locations. Bus service crisscrosses the Salt Lake City neighborhoods providing transit access to TRAX stations.

For the large number of moderate and low-income households living in West Valley City (west of the TRAX station at 2700 west) and Taylorsville public transportation access to high employment areas is problematic. For many it requires bus service to TRAX stations and, unfortunately, much of the bus service in the area, particularly in Taylorsville is at 30 minute intervals or more *Figure 5*. Those needing public transportation are required to walk a few blocks to bus station, take bus to TRAX station, and walk for TRAX station to work. Certainly, more than one hour for perhaps a 7-10 mile commute.

In contrast, Midvale is a low and moderate income area with affordable housing, good transit access to employment areas, and similarly many Sandy low-income residents living in affordable housing on the northwest side of Sandy have good proximity to employment centers.

Figure 3
 Location of Section 8 Voucher Holders and Transportation Network

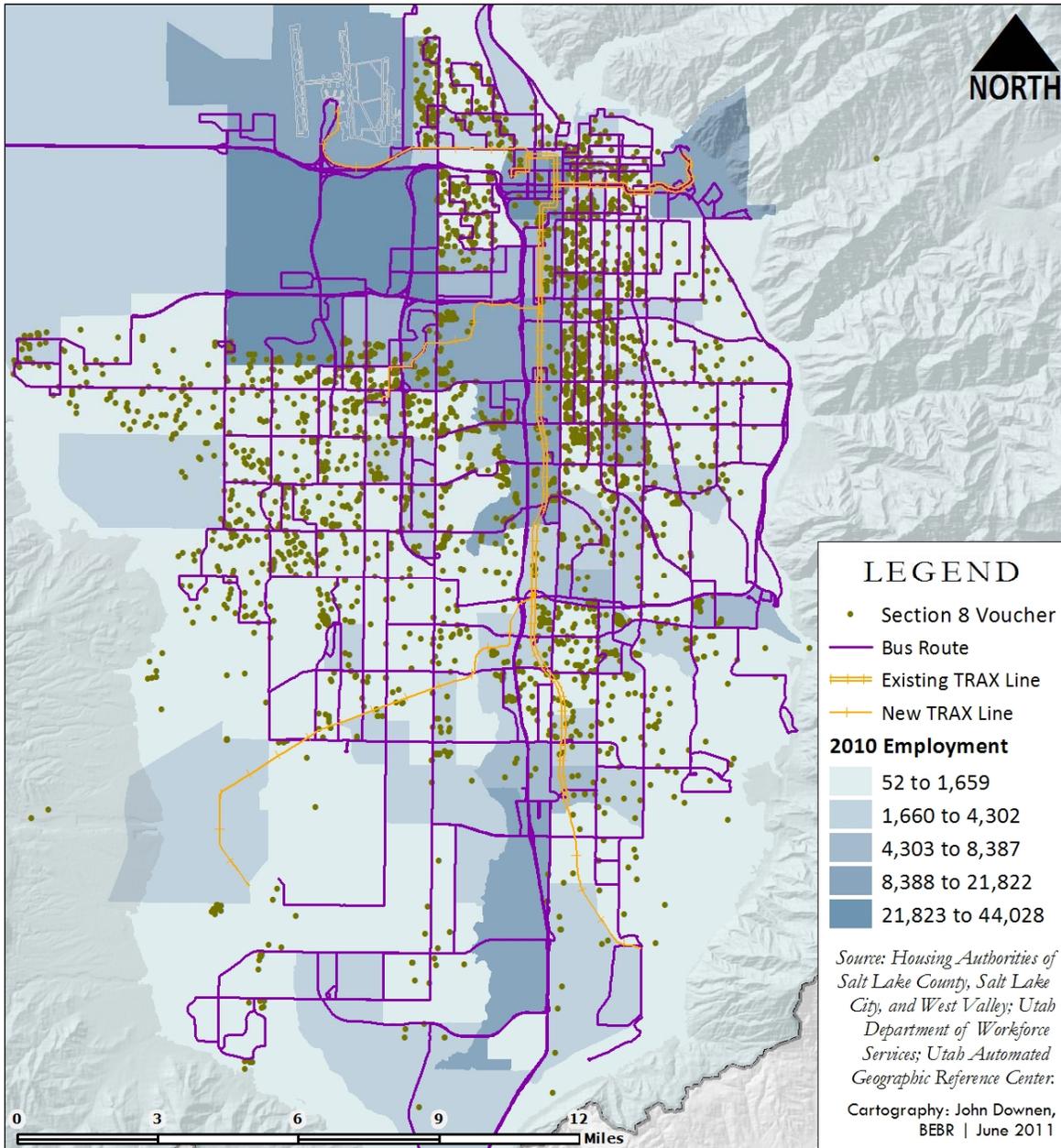
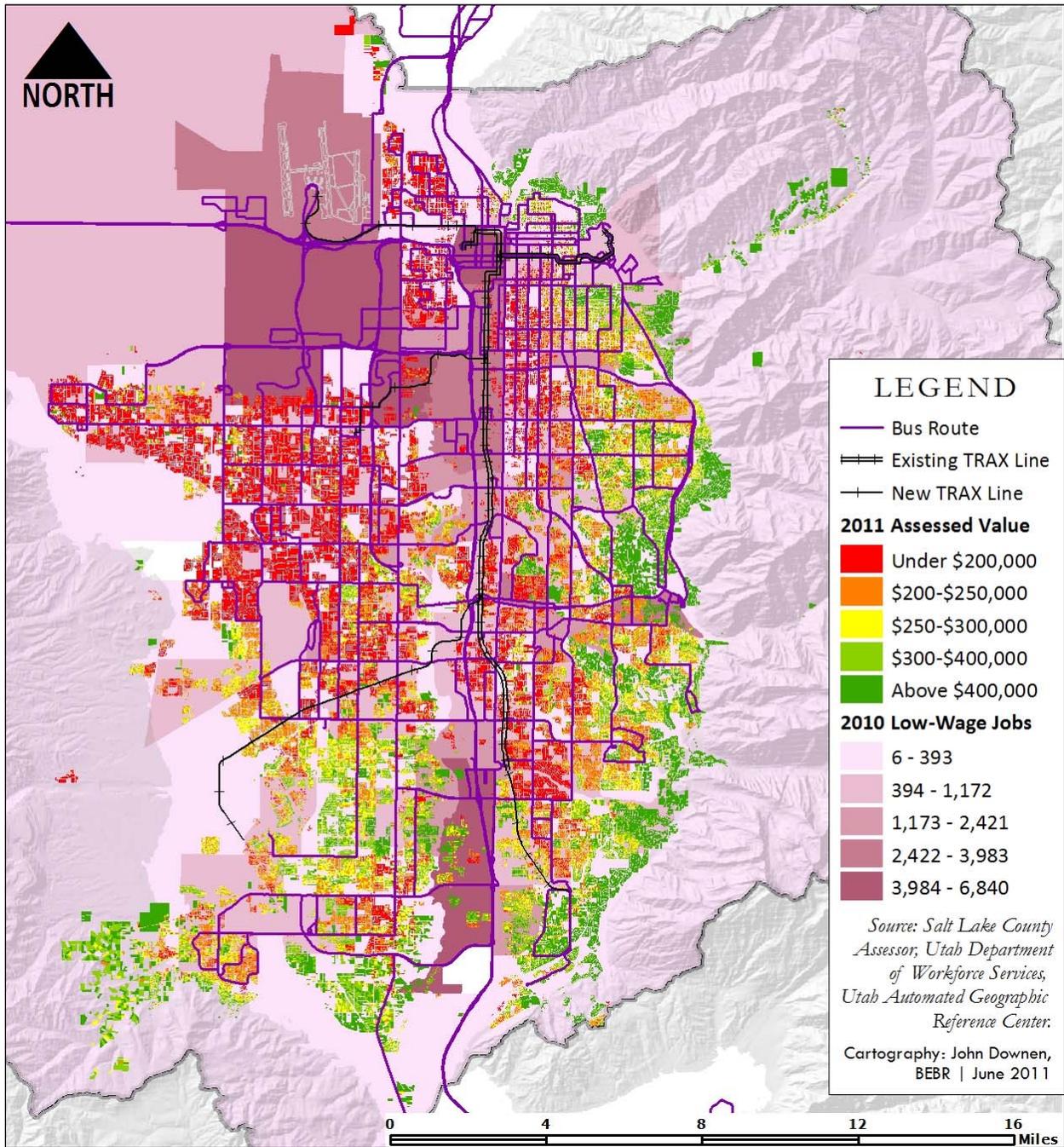


Figure 4
 Transportation Network, Housing Values, and Employment Centers



Commuting to Major Employment Centers — There are four major employment centers for entry-level and low-wage workers in Salt Lake County. These employment centers disproportionately employ minority and ethnic individuals and other protected classes. The employment centers include: Murray, Salt Lake City, Sandy, and West Valley City. Data from the U.S. Census Bureau show that 80-90 percent of those employed in these centers live outside the city *Table 7*. In Salt Lake City 36,400 employees commuting into the city are low-wage workers. Many of these workers would likely live in areas of the county where assessed housing values are less than \$200,000; primarily West Valley City, Taylorsville, and unincorporated Salt Lake County. Some workers are also undoubtedly Section 8 Voucher holders living in rental housing in these same areas. The location of low-wage jobs, commuting patterns, plus concentrations of both affordable housing and Section 8 Voucher holders strongly suggests the critical role of public transportation in providing access to employment opportunities for low-income, transit-dependent households. A disproportionate share of these households are members of a protected class. Household income should be a principal concern in the determination of public transportation routes.

Table 7
Commuting to Major Employment Centers, 2010

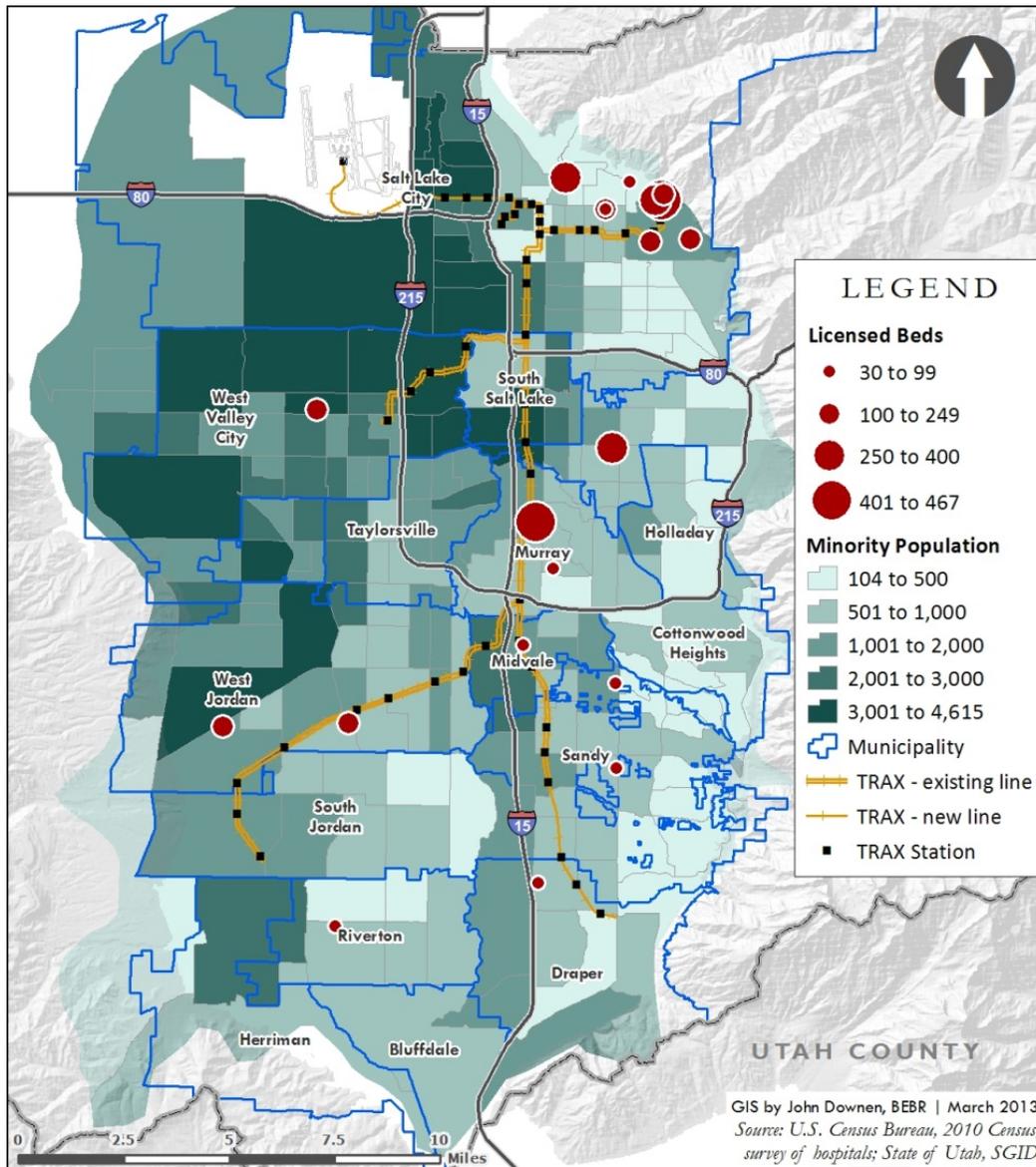
	Sandy	Murray	West Valley City	Salt Lake City
Total Employed	41,750	39,616	62,203	223,880
Employed in the City but Living Outside	35,422	36,625	53,679	182,503
Percent of Total Employment Commuting In	84.9%	92.4%	86.3%	81.5%
Inflow of Employees Earning Less than \$1,250	12,388	10,249	11,975	36,395
Percent of Total Employed	29.9%	25.90%	19.25	16.3

Source: U.S. Census Bureau, OnTheMap Application.

Hospitals: Employment and Health Care – Hospital and major clinics provide not only essential health care services but also job opportunities to low-income households. Hospitals however, are very unevenly distributed throughout Salt Lake County. Of the twenty hospitals in the county with 3,200 beds, nine are located in the extreme northeast corner of the county. These nine hospitals have 1,600 beds *Figure 6*.

The two largest hospitals in Salt Lake County; Intermountain Medical Center and the University of Utah Medical Center are both located on the TRAX line. These important employment centers and health care providers are less accessible by TRAX for low-income households in Taylorsville, parts of West Valley City, and unincorporated Salt Lake County. There is a Bus Rapid Transit system running 10.8 miles down 3500 south from Magna to the 2700 West TRAX station, which is an important transportation network for some of West Valley City residents. But those many low-income households living between 4500 South and 6200 South—UTA’s Taylorsville-Murray study area—should be a high priority for improved access to public transportation, e.g. more frequent bus service.

Figure 6
Hospitals in Salt Lake County



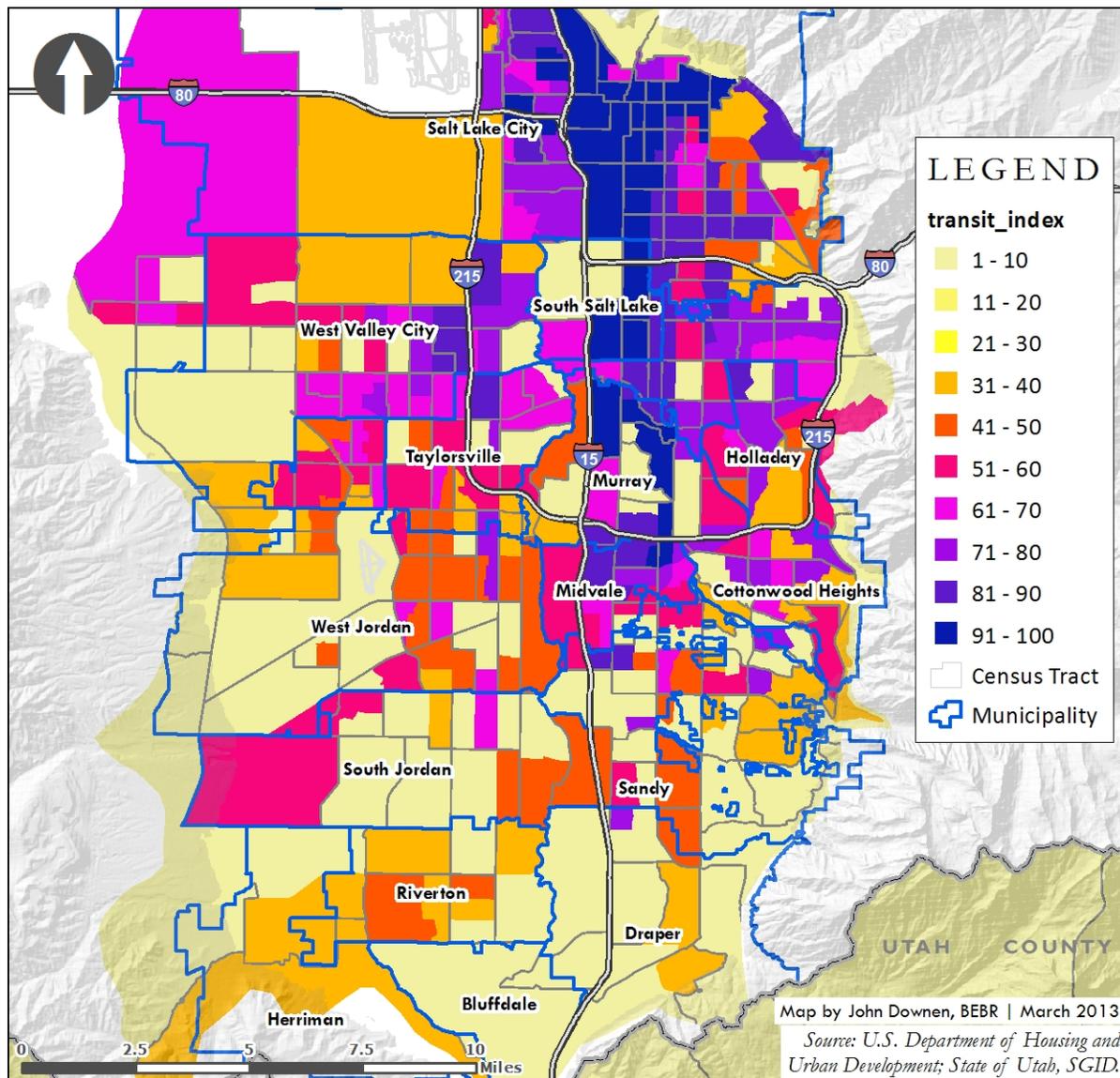
HUD Transit Index

HUD has constructed a transit access index where available data exists to support local analysis. The methodology used in *Figure 7* HUD uses data on over 200 transit agencies that provide data through GTFS (General Transit Feed Specification) Exchange to assess relative accessibility within metro areas. The GTFS based accessibility index is designed to model relative accessibility to amenities via bus or trains within a metro area. Because standardized data on the location of amenities is not uniformly available at a granular level, HUD uses the number of jobs in retail (NAICS 44-45), arts entertainment & recreation (NAICS 71), and food & accommodations (NAICS 72) as proxies for the magnitude of amenities at the block group level from the Local Employment Dynamics dataset published by the Census Bureau. First, HUD identified the number of jobs in these sectors within 1/2 mile of each bus stop and 3/4 mile of each rail transit stop and summed them. Then for each

trip in the transit system, HUD calculated a stop-specific measure of the additional amenities accessed in each ensuing stop on that route, which it then divided by (deflated) the additional travel time to each ensuing stop.

The higher the index number, and the darker the color in *Figure 7*, the better the accessibility to community amenities via bus or TRAX. HUD’s traffic opportunity index confirms that three communities with significant protected class populations— West Valley City, Taylorsville, and West Jordan—are cities where transportation access to amenities including jobs is relatively weak. A condition that impedes access to opportunity.

Figure 7
Transit Index for Salt Lake County



Opportunity Index for Schools

For the children of any neighborhood the most important factor shaping lifetime opportunities is the quality of the local schools; but, as this section will show there are significant disparities in educational opportunities throughout Salt Lake County. The impact of these disparities falls heaviest on the children of protected classes. These disparities have long-term consequences. Most obvious is lower levels of educational attainment, which in turn affects future earnings, trapping individuals, families and entire communities in a generational cycle of poverty. Due to the strong link between education and opportunity considerable discussion and numerous measures were used to evaluate those factors affecting student achievement and school performance.

School Opportunity Index by City

Independent of the HUD opportunity index a separate opportunity index for schools in Salt Lake County was developed by BEBR. This index was created to assess the overall educational opportunity in K-12 public schools in Salt Lake County. The methodology used to determine this index included summing two normalized positive indicators: percent proficiency in language arts and science for elementary, middle, and high schools. Subtracted from these indicators are four negative proxies for home environment and educational quality: free and reduced lunch percentage, percentage of minority students, percentage of students with limited English proficiency parents, and average classroom size. Each school containing data on all of these indicators is then ranked based on their normalized index score by the county. The ranking is then split into decile ranks across the county, with a score of 10 representing the highest opportunity score.

Overall there are 204 schools with complete data on all the indicators. Just as access to opportunity varies across cities within the county, so does public school proficiency and opportunity. The cities with the highest-ranked public schools are Draper, South Jordan, and Herriman. The bottom three cities are South Salt Lake, the west side of Salt Lake City, and West Valley City.

Table 8
Salt Lake County School Opportunity by City

City	Number of Ranked Schools	Average Opportunity Index
Bluffdale	1	7.0
Cottonwood Heights	6	7.7
Draper	2	9.0
Herriman	5	8.4
Holladay	8	7.9
Midvale	6	3.7
Murray	13	6.6
Riverton	9	8.3
Salt Lake City	34	4.2
East Side	18	6.3
West Side	16	1.9
Sandy	20	7.7
South Salt Lake	3	1.0
South Jordan	10	8.9
Taylorsville	12	4.2
West Jordan	20	5.4
West Valley City	23	2.5

Source: BEBR computations from USOE.

The lowest-ranked schools in the county are in the cities with the highest concentrations of poor minority residents. Educational opportunity gaps, compounded by other impediments to housing

choice create disparities in opportunity for protected classes. And the opportunity gap will continue to widen as long as the children of protected classes are limited to low-proficiency schools.

Low-Income Concentrated Schools: Free and Reduced Lunch – Many studies have shown that high rates of poverty are detrimental to school and student achievement. Students from poor households have much higher educational risks and when assigned to a high poverty school the risks and disadvantages are compounded. High concentrations of school poverty are a threat to a student’s educational, social and ultimately employment opportunities. When a school’s student body becomes 50 percent poor, classroom achievement declines; at 75 percent poor achievement is seriously threatened. Income inequality is the driving force in disparities of educational opportunity.

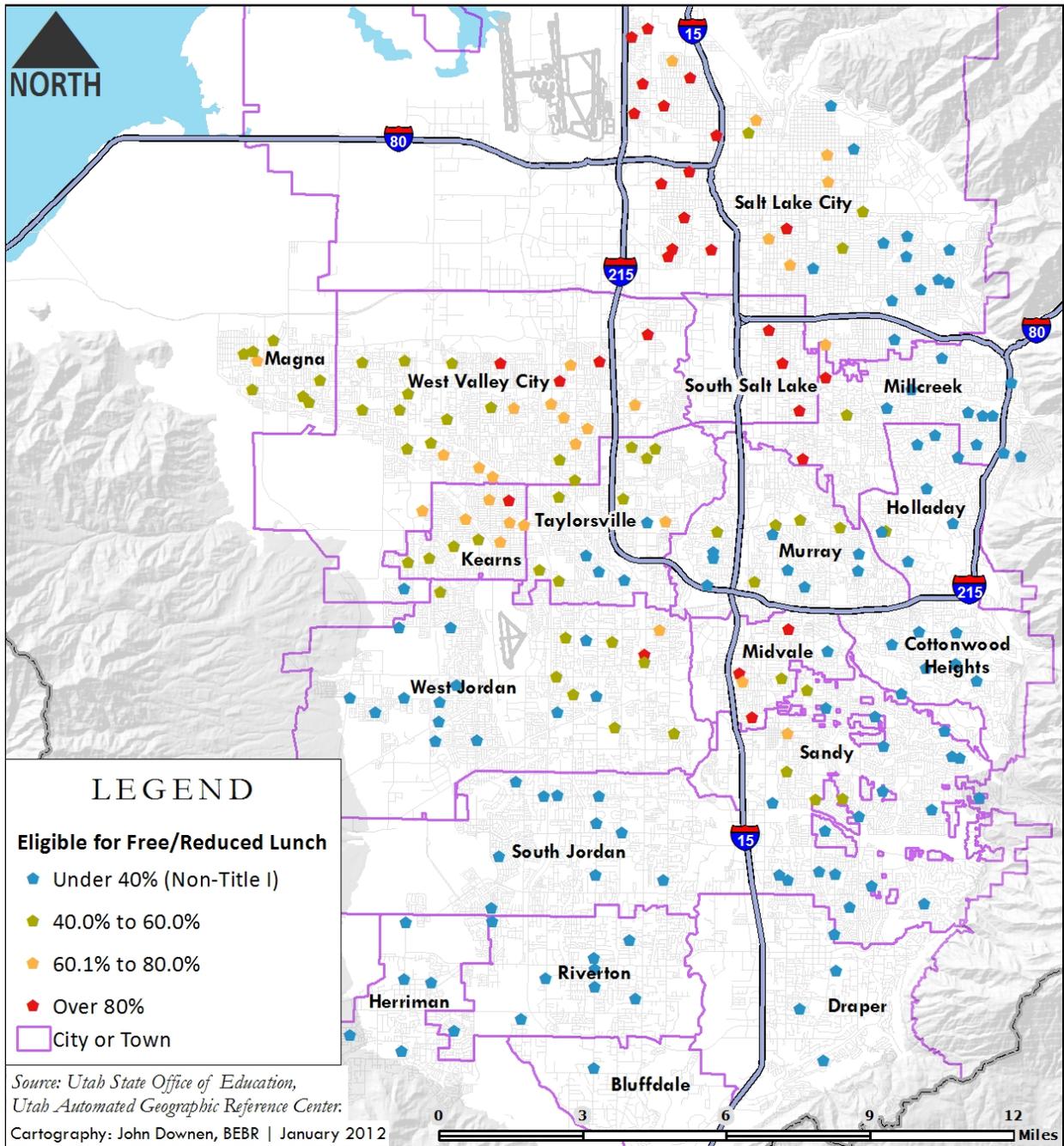
The most often used indicator of a school’s socioeconomic background is the Title I designation. In order for a school to qualify as a Title I school at least 40 percent of the students must be eligible for free and reduced lunch. To be eligible for free lunch the income of the student’s family cannot exceed 130 percent of the poverty level. Reduced lunch eligibility is limited to those students from families with incomes between 130 percent and 185 percent of the poverty level. Once a school crosses the 40 percent threshold the school is designated a Title I school and eligible for federal funds. These funds are targeted to help expand educational opportunities for poor children. It is important to emphasize that many of the families whose students qualify for free and reduced lunch are above the poverty line. The number of students whose families are actually below the poverty line is unknown. Nevertheless, the Title I designation is a reasonable proxy by which to identify those schools at risk of becoming high poverty schools.

Of Salt Lake County’s 220 elementary, middle and high schools 109 are Title I schools *Table 9. Figure 8* shows the areas of greatest concentration of low-income and poverty households with a color code. Those schools with at least 80 percent of the students qualifying for free and reduced lunch are shown in red. These schools are primarily located in west side Salt Lake City, West Valley City, South Salt Lake, and Midvale. Salt Lake City has 14 of the county’s 27 schools with at least 80 percent of the students eligible for free and reduced lunch.

The spatial distribution of Title I schools is very similar to patterns of settlement of minorities, disabled, and single-parent households. Children from low-income households in Title I schools should benefit from additional federal funding due to their Title I designation but, there is a strong countervailing force. Schools in poor neighborhoods are beset with a number of issues that erode academic achievement and eventually limit opportunities; issues such as crime and gang problems, high drop-out rates, and teen pregnancies. Expanding housing choice for low-income minorities and disabled families beyond neighborhoods that are racially and ethnically concentrated areas of poverty is an articulated HUD goal for a Regional Analysis of Impediments.

Sixty to 80 percent of the student body of schools colored in gold in *Figure 8* qualify for free and reduced lunch and those in red indicate more than 80 percent of the student body qualifies for free and reduced lunch. These are schools where student achievement is also at risk due to socioeconomic conditions.

Figure 8
 Percent of Students Eligible in Public Schools for Free and Reduced Lunch



**Table 9
Public Schools in Salt Lake County Ranked by Percent of Total School Enrollment
Eligible for Free and Reduced Lunch, 2011**

Rank	School	Address	City	School District	% Eligible
1	Meadowlark Elementary	497 North Morton Drive	Salt Lake City	Salt Lake	94.3%
2	Glendale Middle	1430 West Andrew Avenue	Salt Lake City	Salt Lake	94.1%
3	Lincoln Elementary	450 East 3700 South	Salt Lake City	Granite	92.8%
4	Edison Elementary	466 Cheyenne	Salt Lake City	Salt Lake	92.2%
5	Franklin Elementary	1115 West 300 South	Salt Lake City	Salt Lake	91.7%
6	Copperview Elementary	8449 South 150 West	Midvale	Canyons	91.0%
7	Mountain View Elementary	1380 South Navajo	Salt Lake City	Salt Lake	90.2%
8	Midvale Elementary	362 West Center	Midvale	Canyons	90.1%
9	Riley Elementary	1410 South 800 West	Salt Lake City	Salt Lake	89.3%
10	Backman Elementary	601 North 1500 West	Salt Lake City	Salt Lake	89.3%
11	Northwest Middle	1730 West 1700 North	Salt Lake City	Salt Lake	88.8%
12	Lincoln Elementary	1090 South Roberta Street	Salt Lake City	Salt Lake	87.5%
13	Stansbury Elementary	3050 South 2700 West	West Valley City	Granite	87.0%
14	Rose Park Elementary	1105 West 1000 North	Salt Lake City	Salt Lake	86.8%
15	Jackson Elementary	750 West 200 North	Salt Lake City	Salt Lake	86.8%
16	Parkview Elementary	970 South Emery Street	Salt Lake City	Salt Lake	86.5%
17	Redwood Elementary	2650 South Redwood Road	West Valley City	Granite	86.4%
18	Monroe Elementary	4450 West 3100 South	West Valley City	Granite	85.7%
19	David Gourley Elementary	4905 South 4300 West	Kearns	Granite	84.8%
20	West Lake Jr High	3400 South 3450 West	West Valley City	Granite	84.7%
21	Roosevelt Elementary	3225 South 800 East	Salt Lake County	Granite	84.4%
22	Granite Park Jr High	3031 South 200 East	Salt Lake County	Granite	84.0%
23	North Star Elementary	1545 North Morton Drive	Salt Lake City	Salt Lake	82.2%
24	Majestic Elementary	7430 South 1700 West	West Jordan	Jordan	81.7%
25	James E Moss Elementary	4399 South 500 East	Salt Lake County	Granite	80.4%
26	Escalante Elementary	1810 West 900 North	Salt Lake City	Salt Lake	80.3%
27	East Midvale Elementary	6990 South 300 East	Midvale	Canyons	80.3%
28	Woodrow Wilson Elementary	2567 South Main	Salt Lake County	Granite	80.1%
29	Hillsdale Elementary	3275 West 3100 South	West Valley City	Granite	79.9%
30	Pioneer Elementary	3860 South 3380 West	West Valley City	Granite	79.9%
31	M Lynn Bennion Elementary	429 South 800 East	Salt Lake City	Salt Lake	79.7%
32	West Kearns Elementary	4900 South 4620 West	Kearns	Granite	79.3%
33	Granger Elementary	3702 South 1950 West	West Valley City	Granite	78.9%
34	Western Hills Elementary	5190 South Heath Avenue	Kearns	Granite	77.4%
35	Kearns Jr High	4040 West 5305 South	Kearns	Granite	77.3%
36	Newman Elementary	1269 North Colorado Street	Salt Lake City	Salt Lake	77.1%
37	Bryant Middle	40 South 800 East	Salt Lake City	Salt Lake	76.4%
38	Washington Elementary	420 North 200 West	Salt Lake City	Salt Lake	75.2%
39	South Kearns Elementary	4430 West 5570 South	Kearns	Granite	73.5%
40	Oquirrh Hills Elementary	5241 South 4280 West	Kearns	Granite	72.4%
41	Rolling Meadows Elementary	2950 Whitehall Drive	West Valley City	Granite	69.6%
42	Philo T Farnsworth Elem	3751 South 4225 West	West Valley City	Granite	69.2%
43	Sandy Elementary	8725 South 280 East	Sandy	Canyons	68.7%
44	Academy Park Elementary	4580 Westpoint Drive	West Valley City	Granite	67.3%
45	Midvale Middle	7852 South Pioneer Street	Midvale	Canyons	65.1%
46	Whittier Elementary	1600 South 300 East	Salt Lake City	Salt Lake	65.0%

Rank	School	Address	City	School District	% Eligible
47	Silver Hills Elementary	5770 West 5100 South	Kearns	Granite	64.1%
48	Plymouth Elementary	5220 South 1470 West	Salt Lake County	Granite	63.0%
49	Valley Jr High	4195 South 3200 West	West Valley City	Granite	62.5%
50	Horizonte	1234 South Main Street	Salt Lake City	Salt Lake	61.9%
51	John F Kennedy Jr High	4495 South 4800 West	West Valley City	Granite	61.4%
52	Nibley Park Elementary	2785 South 800 East	Salt Lake City	Salt Lake	61.2%
53	Heartland Elementary	1451 West 7000 South	West Jordan	Jordan	61.1%
54	Hunter Elementary	4351 South 5400 West	West Valley City	Granite	60.8%
55	Magna Elementary	8500 West 3100 South	Magna	Granite	60.2%
56	Granger High	3690 South 3600 West	West Valley City	Granite	60.1%
57	Douglas T Orchard Elem	6744 West 3800 South	West Valley City	Granite	59.9%
58	Taylorville Elementary	2010 West 4230 South	Taylorville	Granite	59.6%
59	Oquirrh Elementary	7165 South Paddington Road	West Jordan	Jordan	59.1%
60	Robert Frost Elementary	3444 West 4400 South	West Valley City	Granite	58.7%
61	Columbia Elementary	3505 West 7800 South	West Jordan	Jordan	58.6%
62	Pleasant Green Elementary	8201 West 2700 South	Magna	Granite	58.5%
63	Jackling Elementary	3760 South 4610 West	West Valley City	Granite	58.4%
64	Carl Sandburg Elementary	3900 South 5325 West	West Valley City	Granite	56.9%
65	Lake Ridge Elementary	7400 West 3400 South	Magna	Granite	56.5%
66	East High	840 South 1300 East	Salt Lake City	Salt Lake	56.5%
67	Valley Crest Elementary	5240 West 3100 South	West Valley	Granite	56.3%
68	West High	241 North 300 West	Salt Lake City	Salt Lake	56.2%
69	Mill Creek Elementary	3761 South 1100 East	Salt Lake County	Granite	56.0%
70	Vista Elementary	4925 South 2200 West	Taylorville	Granite	55.6%
71	Beehive Elementary	5655 South 5220 West	Kearns	Granite	55.1%
72	Eisenhower Jr High	4351 South Redwood Road	Taylorville	Granite	54.6%
73	Joel P Jensen Middle	8105 South 3200 West	West Jordan	Jordan	54.4%
74	Scott M Matheson Jr High	3650 South Montclair Street	Magna	Granite	54.3%
75	Midvalley Elementary	217 East 7800 South	Midvale	Canyons	54.2%
76	John C Fremont Elementary	4249 South 1425 West	Taylorville	Granite	54.1%
77	Arcadia Elementary	3461 West 4850 South	Taylorville	Granite	53.7%
78	Copper Hills Elementary	7635 West 3715 South	Magna	Granite	53.6%
79	West Valley Elementary	6049 West Brud Drive	West Valley City	Granite	53.4%
80	West Jordan Middle	7550 South 1700 West	West Jordan	Jordan	52.3%
81	Mount Jordan Middle	9360 South 300 East	Sandy	Canyons	52.3%
82	Parkside Elementary	5175 South 495 East	Murray	Murray	52.1%
83	Whittier Elementary	3585 South 6000 West	West Valley City	Granite	52.0%
84	Horizon Elementary	5180 South 700 West	Murray	Murray	51.9%
85	Harry S Truman Elementary	4639 South 3200 West	West Valley City	Granite	51.8%
86	Fox Hills Elementary	3775 West 6020 South	Salt Lake County	Granite	51.4%
87	Jim Bridger Elementary	5368 West Cyclamen Way	West Jordan	Granite	51.3%
88	Elk Run Elementary	3550 South Helen Drive	Magna	Granite	49.4%
89	Brockbank Jr High	2935 South 8560 West	Magna	Granite	49.0%
90	Hillside Elementary	4283 South 6000 West	West Valley City	Granite	48.7%
91	Riverside Elementary	8737 South 1220 West	West Jordan	Jordan	48.3%
92	Westvale Elementary	2300 West 8660 South	West Jordan	Jordan	48.1%
93	Westbrook Elementary	3451 West 6200 South	Taylorville	Granite	48.1%
94	Thomas Jefferson Jr High	5850 South 5600 West	Kearns	Granite	47.8%
95	Hunter Jr High	6131 West 3785 South	West Valley City	Granite	47.4%
96	Union Middle	615 East 8000 South	Sandy	Canyons	46.6%
97	Kearns High	5525 Cougar Lane	Kearns	Granite	46.1%
98	Thomas W Bacchus Elem	5925 South 5975 West	Kearns	Granite	46.1%

Rank	School	Address	City	School District	% Eligible
99	Gerald Wright Elementary	6760 West 3100 South	West Valley City	Granite	45.9%
100	Twin Peaks Elementary	5325 South 1045 East	Salt Lake County	Granite	44.1%
101	Hunter High	4200 South 5600 West	West Valley City	Granite	43.3%
102	West Jordan Elementary	7220 South 2370 West	West Jordan	Jordan	42.9%
103	Cyprus High	8623 West 3000 South	Magna	Granite	41.4%
104	Edgemont Elementary	1085 East 9800 South	Sandy	Canyons	41.4%
105	Bell View Elementary	9800 South 800 East	Sandy	Canyons	41.2%
106	Emerson Elementary	1017 Harrison Avenue	Salt Lake City	Salt Lake	40.6%
107	Liberty Elementary	140 West 6100 South	Murray	Murray	40.5%
108	Spring Lane Elementary	5315 South 1700 East	Salt Lake County	Granite	40.2%
109	Hillcrest Jr High	126 East 5300 South	Murray	Murray	40.1%
Schools Below 40% Do Not Qualify as Title I Schools					
110	Cottonwood High	5715 South 1300 East	Salt Lake County	Granite	39.7%
111	West Jordan High	8136 South 2700 West	West Jordan	Jordan	38.7%
112	Terra Linda Elementary	8400 South 3400 West	West Jordan	Jordan	38.6%
113	Hillside Middle	1825 South Nevada	Salt Lake City	Salt Lake	38.2%
114	Hillcrest High	7350 South 900 East	Midvale	Canyons	38.1%
115	Mountain Shadows Elementary	5255 West 7000 South	West Jordan	Jordan	38.0%
116	Bonneville Jr High	5330 South 1660 East	Salt Lake County	Granite	37.8%
117	Bennion Jr High	6055 South 2700 West	Taylorsville	Granite	37.6%
118	Highland High	2166 South 1700 East	Salt Lake City	Salt Lake	37.4%
119	Bella Vista Elementary	2131 East 7000 South	Salt Lake City	Canyons	36.8%
120	Evergreen Jr High	3401 South 2000 East	Salt Lake County	Granite	36.0%
121	Copper Canyon Elementary	8917 South Copperwood Drive	West Jordan	Jordan	35.4%
122	Hawthorne Elementary	1675 South 600 East	Salt Lake City	Salt Lake	34.6%
123	McMillan Elementary	315 East 5900 South	Murray	Murray	34.5%
124	Taylorsville High	5225 South Redwood Road	Taylorsville	Granite	34.3%
125	Bennion Elementary	5775 South Sierra Grande Drive	Salt Lake County	Granite	34.2%
126	Clayton Middle	1470 South 1900 East	Salt Lake City	Salt Lake	33.4%
127	Westland Elementary	2925 West 7180 South	West Jordan	Jordan	33.4%
128	Calvin S Smith Elementary	2150 West 6200 South	Taylorsville	Granite	33.2%
129	Rosecrest Elementary	2420 Fisher Lane	Salt Lake City	Granite	33.1%
130	Falcon Ridge Elementary	6111 West 7000 South	West Jordan	Jordan	32.8%
131	East Sandy Elementary	8295 South 870 East	Sandy	Canyons	32.7%
132	Silver Mesa Elementary	8920 South 1700 East	Sandy	Canyons	32.4%
133	West Hills Middle	8270 South Grizzly Road	West Jordan	Jordan	32.3%
134	Oakdale Elementary	1900 East Creek Road	Sandy	Canyons	32.1%
135	Jordan High	95 East Beetdigger Blvd	Sandy	Canyons	31.7%
136	Diamond Ridge Elementary	6034 Mill Valley Lane	Salt Lake County	Granite	31.4%
137	Crescent Elementary	11100 South 230 East	Sandy	Canyons	31.2%
138	Eastmont Middle	10100 South 1300 East	Sandy	Canyons	31.2%
139	Sunset Ridge Middle	6881 West 8200 South	West Jordan	Jordan	29.7%
140	Ridgecrest Elementary	1800 East 7200 South	Cottonwood Heights	Canyons	29.6%
141	Alta View Elementary	10333 Crocus Street	Sandy	Canyons	29.3%
142	Viewmont Elementary	745 West 5720 South	Murray	Murray	29.3%
143	Longview Elementary	6240 Longview Drive	Murray	Murray	29.3%
144	Jordan Hills Elementary	8892 South 4800 West	West Jordan	Jordan	28.4%
145	Woodstock Elementary	6015 South 1300 East	Salt Lake County	Granite	28.2%
146	Riverview Jr High	751 West Tripp Lane	Murray	Murray	27.9%
147	Grant Elementary	662 West 6140 South	Murray	Murray	27.7%

Rank	School	Address	City	School District	% Eligible
148	Bluffdale Elementary	14323 South 2700 West	Bluffdale	Jordan	27.6%
149	Highland Park Elementary	1738 East 2700 South	Salt Lake City	Salt Lake	26.9%
150	Copper Hills High	5445 West New Bingham Hwy	West Jordan	Jordan	26.8%
151	Riverton Elementary	13150 South 1830 West	Riverton	Jordan	26.4%
152	Silver Crest Elementary	12937 South Elementary Drive	Herriman	Jordan	26.1%
153	Butler Middle	7530 South 2700 East	Salt Lake County	Canyons	26.0%
154	Oakcrest Elementary	8462 South Hilltop Oak Drive	West Jordan	Jordan	25.4%
155	Murray High	5440 South State Street	Murray	Murray	25.2%
156	Fox Hollow Elementary	6020 West 8200 South	West Jordan	Jordan	24.0%
157	Beacon Heights Elementary	1850 South 2500 East	Salt Lake City	Salt Lake	22.8%
158	Midas Creek Elementary	11901 South Park Haven Lane	Riverton	Jordan	22.8%
159	South Hills Middle	13508 South 4000 West	Riverton	Jordan	22.7%
160	Altara Elementary	800 East 11000 South	Sandy	Canyons	22.4%
161	Hayden Peak Elementary	5120 West Hayden Peak Drive	West Jordan	Jordan	22.3%
162	Willow Canyon Elementary	9650 South 1700 East	Sandy	Canyons	22.2%
163	Rosamond Elementary	12195 South 1975 West	Riverton	Jordan	22.2%
164	Wasatch Elementary	30 R Street	Salt Lake City	Salt Lake	22.1%
165	Sprucewood Elementary	12025 South 1000 East	Sandy	Canyons	21.8%
166	Crestview Elementary	2100 East Lincoln Lane	Salt Lake County	Granite	21.4%
167	Butler Elementary	2700 East 7000 South	Salt Lake County	Canyons	21.3%
168	William Penn Elementary	1670 Siggard Drive	Salt Lake County	Granite	21.1%
169	Indian Hills Elementary	2496 St Marys Drive	Salt Lake City	Salt Lake	20.8%
170	Peruvian Peak Elementary	1545 East 8425 South	Sandy	Canyons	20.8%
171	Elk Meadows Elementary	3448 West 9800 South	South Jordan	Jordan	20.4%
172	Herriman High	11917 South 6000 West	Herriman	Jordan	20.3%
173	Crescent View Middle	11150 South 300 East	Sandy	Canyons	19.9%
174	Oakwood Elementary	5815 South Highland Drive	Salt Lake County	Granite	19.1%
175	Elk Ridge Middle	3659 West 9800 South	South Jordan	Jordan	19.1%
176	Ensign Elementary	775 12th Avenue	Salt Lake City	Salt Lake	19.0%
177	South Jordan Elementary	11205 South Black Cherry Way	South Jordan	Jordan	18.7%
178	Oquirrh Hills Middle	12949 South 2700 West	Riverton	Jordan	18.4%
179	Southland Elementary	12675 South 2700 West	Riverton	Jordan	18.3%
180	Fort Herriman Middle	14050 South Mirabella Drive	Herriman	Jordan	18.3%
181	Daybreak Elementary	4544 West Harvest Moon Drive	South Jordan	Jordan	17.8%
182	Butterfield Canyon Elementary	6860 West Mary Leizan Lane	Herriman	Jordan	17.7%
183	Dilworth Elementary	1953 South 2100 East	Salt Lake City	Salt Lake	17.4%
184	Albion Middle	2755 East Newcastle Drive	Sandy	Canyons	17.4%
185	Sunrise Elementary	1520 East 11265 South	Sandy	Canyons	17.0%
186	Park Lane Elementary	9955 South 2300 East	Sandy	Canyons	16.8%
187	Welby Elementary	4130 West 9580 South	South Jordan	Jordan	16.5%
188	Riverton High	12476 South 2700 West	Riverton	Jordan	16.3%
189	Rose Creek Elementary	12812 South 3600 West	Riverton	Jordan	16.2%
190	Canyon View Elementary	3050 East 7800 South	Salt Lake County	Canyons	16.0%
191	Herriman Elementary	13170 South 6000 West	Herriman	Jordan	16.0%
192	Willow Springs Elementary	13288 South Lone Peak Drive	Draper	Canyons	15.0%
193	South Jordan Middle	10245 South 2700 West	South Jordan	Jordan	14.6%

Rank	School	Address	City	School District	% Eligible
194	Olympus High	4055 South 2300 East	Salt Lake County	Granite	14.4%
195	Upland Terrance Elementary	3700 South 2860 East	Salt Lake County	Granite	14.4%
196	Indian Hills Middle	1180 East Sanders Road	Sandy	Canyons	14.3%
197	Monte Vista Elementary	11121 South 2700 West	South Jordan	Jordan	14.2%
198	Howard R Driggs Elementary	4340 South 2700 East	Salt Lake County	Granite	14.1%
199	Brighton High	2220 East Bengal Blvd	Salt Lake County	Canyons	13.9%
200	Draper Elementary	1080 East 12660 South	Draper	Canyons	13.8%
201	Granite Elementary	9760 South 3100 East	Sandy	Canyons	13.7%
202	Oak Hollow Elementary	14400 South 884 East	Draper	Canyons	12.9%
203	Quail Hollow Elementary	2625 East Newcastle Drive	Sandy	Canyons	12.7%
204	Bingham High	2160 West 10400 South	South Jordan	Jordan	12.3%
205	Foothills Elementary	13717 South Shaggy Peak	Riverton	Jordan	11.9%
206	Olympus Jr High	2217 East 4800 South	Salt Lake County	Granite	11.8%
207	Morningside Elementary	4170 South 3000 East	Salt Lake County	Granite	11.5%
208	Alta High	11055 South 1000 East	Sandy	Canyons	11.4%
209	Churchill Jr High	3450 Oakview Drive	Salt Lake County	Granite	11.1%
210	Jordan Ridge Elementary	2636 West 9800 South	South Jordan	Jordan	11.0%
211	Eastlake Elementary	4389 West Isla Daybreak Rd	South Jordan	Jordan	10.9%
212	Brookwood Elementary	8640 South Snowbird	Sandy	Canyons	10.7%
213	Uintah Elementary	1571 East 1300 South	Salt Lake County	Salt Lake	10.7%
214	Bonneville Elementary	1145 South 1900 East	Salt Lake City	Salt Lake	10.1%
215	Wasatch Jr High	3750 South 3100 East	Salt Lake County	Granite	9.3%
216	Lone Peak Elementary	11515 South Mesa Drive	Sandy	Canyons	9.3%
217	Skyline High	3251 East 3760 South	Salt Lake County	Granite	9.0%
218	Eastwood Elementary	3305 Wasatch Blvd	Salt Lake County	Granite	8.1%
219	Cottonwood Elementary	5205 Holladay Blvd	Salt Lake County	Granite	5.5%
220	Oakridge Elementary	4325 South Jupiter Drive	Salt Lake County	Granite	4.3%

Source: Utah State Office of Education.

Demographics of Student Populations — The increasing concentrations of minority and ethnic populations in a small area of Salt Lake County—west Salt Lake City, South Salt Lake, West Valley City, Midvale, and Taylorsville—has inevitably led to a disproportionate number of minority and ethnic students in these communities. Annually, the Utah System of Education collects data on the fall enrollments of each school in the state. Included in these data are the racial and ethnic characteristics of students enrolled in public schools in grades K through 12. The survey allows each student to choose only a single race/ethnicity category (including a multi-race option), creating a distinct count per student. Allowing each student to only be classified by one race/ethnic category eliminates the issue of double counting individual students who identify as more than one distinct race. This allows for a unique analysis of racial and ethnic makeup of public schools in Utah.

The minority share of total enrollment in public schools in each city in Salt Lake County is shown in *Table 10*. Overall, minority enrollment accounted for 33 percent of total enrollment in 2011 in Salt Lake County schools. In four cities—Kearns, Salt Lake City, South Salt Lake, and West Valley City—over 50 percent of the student population was minority. Countywide, 22 percent of all students were Hispanic/Latino, by far the largest minority student population.

The composition of minorities by minority group for each city is shown in *Table 11*. These data shows that two-thirds of the minority student population in Salt Lake County is Hispanic/Latino and in four cities—Kearns, Magna, West Valley City, and Midvale—Hispanic/Latino students were

over 70 percent of the minority population; very high concentrations of a single minority group. Asian and Pacific Islanders rank second and third with 9.6 percent and 8.0 percent shares, respectively, of the minority student population. The prevalence of each race and ethnicity among the minority students is shown in *Figure 9*, as well as a comparison of the share of minority enrollment by city in 2007 and 2011. In every city, the minority share of the student body increased during the 2007-2011 period. This growth was experienced in almost every racial and ethnic category, but especially among Hispanics. This indicates an overall growth in minority families across the entire county. However, some jurisdictions including Kearns, Magna, and West Valley City grew at higher rates than others, confirming again the increasing concentration of minority families in these areas.

Consistently the same four or five cities are disproportionately affected by growing concentrations of minorities in a few cities in Salt Lake County. For some public schools this has led to very high rates of minority students, primarily Hispanic students. The increasing proportion of children with non-English backgrounds can put an extra burden on a school's administration, teachers, and resources. Difficulty with English may impede proficiency in academic subjects, hurting both student and school achievement. Not only is there a heavy concentration of minority students in the Salt Lake City, South Salt Lake, West Valley City, Kearns, and Magna schools but, a substantial share of these minority students are members of low-income or poor households, which intensifies the challenge and raises the risk that a school's socioeconomic background may limit educational opportunities. For example high minority, high poverty schools may have a "dilution of the curriculum" to accommodate low achieving students accompanied with diminished teacher expectations; a potentially damaging consequence of high concentrations of low-income minority households.

Table 10
Percent of Total Enrollment by Race/Ethnicity, Fall 2011

City	Minority	African Am or Black	American Indian/ Alaskan Native	Asian	Hispanic/ Latino	Multi-Race	Pacific Islander
Salt Lake County	33.3%	2.3%	1.2%	3.2%	22.3%	1.7%	2.7%
Cottonwood Heights	16.0%	1.3%	0.6%	2.3%	7.0%	3.7%	1.1%
Draper/Herriman/Bluffdale	11.4%	0.8%	0.4%	1.2%	6.0%	2.1%	0.9%
Holladay	16.0%	1.9%	0.7%	5.4%	6.7%	0.4%	0.9%
Kearns	52.0%	2.5%	1.6%	1.9%	40.6%	0.6%	4.9%
Magna	38.3%	2.0%	1.4%	1.4%	29.5%	0.5%	3.5%
Midvale	45.2%	2.0%	3.1%	3.2%	32.8%	2.9%	1.2%
Murray City	26.7%	3.5%	1.0%	3.2%	16.2%	1.2%	1.6%
Riverton	9.8%	0.6%	0.3%	1.1%	4.9%	2.0%	0.7%
Sandy + Alta	16.4%	1.2%	0.7%	2.5%	8.5%	2.2%	1.2%
Salt Lake City	52.6%	4.3%	1.7%	4.3%	36.1%	1.9%	4.4%
South Jordan	15.0%	0.8%	0.2%	1.9%	7.4%	3.3%	1.4%
South Salt Lake	59.8%	7.1%	3.2%	8.3%	38.4%	0.8%	2.0%
Taylorsville	40.5%	3.0%	1.4%	5.0%	26.9%	0.4%	3.8%
West Jordan	29.5%	1.2%	0.7%	2.1%	20.3%	3.0%	2.2%
West Valley City	58.3%	3.0%	1.8%	4.5%	43.1%	0.3%	5.6%

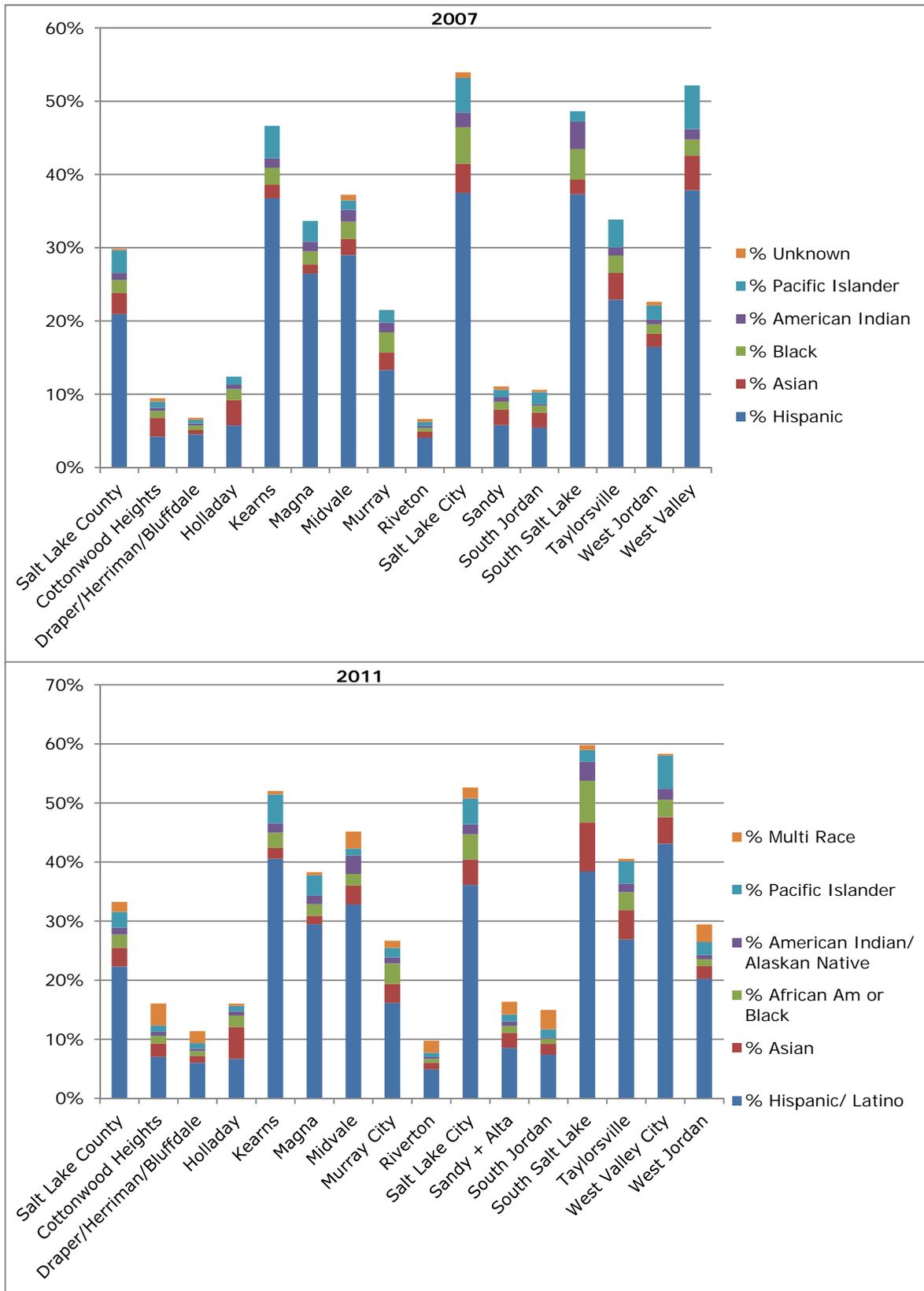
Source: BEBR Computations from Utah State Office of Education

Table 11
Percent of Minority Enrollment by Race/Ethnicity, Fall 2011

City Totals	% of Total Enrollment is Minority	African Am or Black	American Indian/ Alaskan Native	Asian	Hispanic/ Latino	Multi-Race	Pacific Islander
Salt Lake County	33.3%	6.8%	3.5%	9.6%	67.0%	5.1%	8.0%
Cottonwood Heights	16.0%	8.1%	4.0%	14.2%	43.7%	23.2%	6.8%
Draper/Herriman/Bluffdale	11.4%	7.0%	3.5%	10.2%	53.0%	18.0%	8.3%
Holladay	16.0%	12.1%	4.6%	33.6%	41.7%	2.6%	5.5%
Kearns	52.0%	4.9%	3.1%	3.6%	78.0%	1.1%	9.4%
Magna	38.3%	5.1%	3.8%	3.7%	77.0%	1.3%	9.1%
Midvale	45.2%	4.3%	6.8%	7.1%	72.7%	6.3%	2.7%
Murray City	26.7%	13.0%	3.9%	12.0%	60.6%	4.5%	6.0%
Riverton	9.8%	6.6%	3.4%	11.5%	50.4%	20.9%	7.3%
Sandy + Alta	16.4%	7.3%	4.5%	15.4%	52.2%	13.3%	7.4%
Salt Lake City	52.6%	8.1%	3.2%	8.2%	68.6%	3.5%	8.3%
South Jordan	15.0%	5.6%	1.3%	12.4%	49.2%	22.0%	9.4%
South Salt Lake	59.8%	11.8%	5.4%	13.9%	64.2%	1.3%	3.4%
Taylorsville	40.5%	7.5%	3.5%	12.2%	66.4%	1.1%	9.3%
West Jordan	29.5%	4.0%	2.4%	7.2%	68.8%	10.2%	7.5%
West Valley City	58.3%	5.1%	3.1%	7.7%	73.9%	0.5%	9.7%

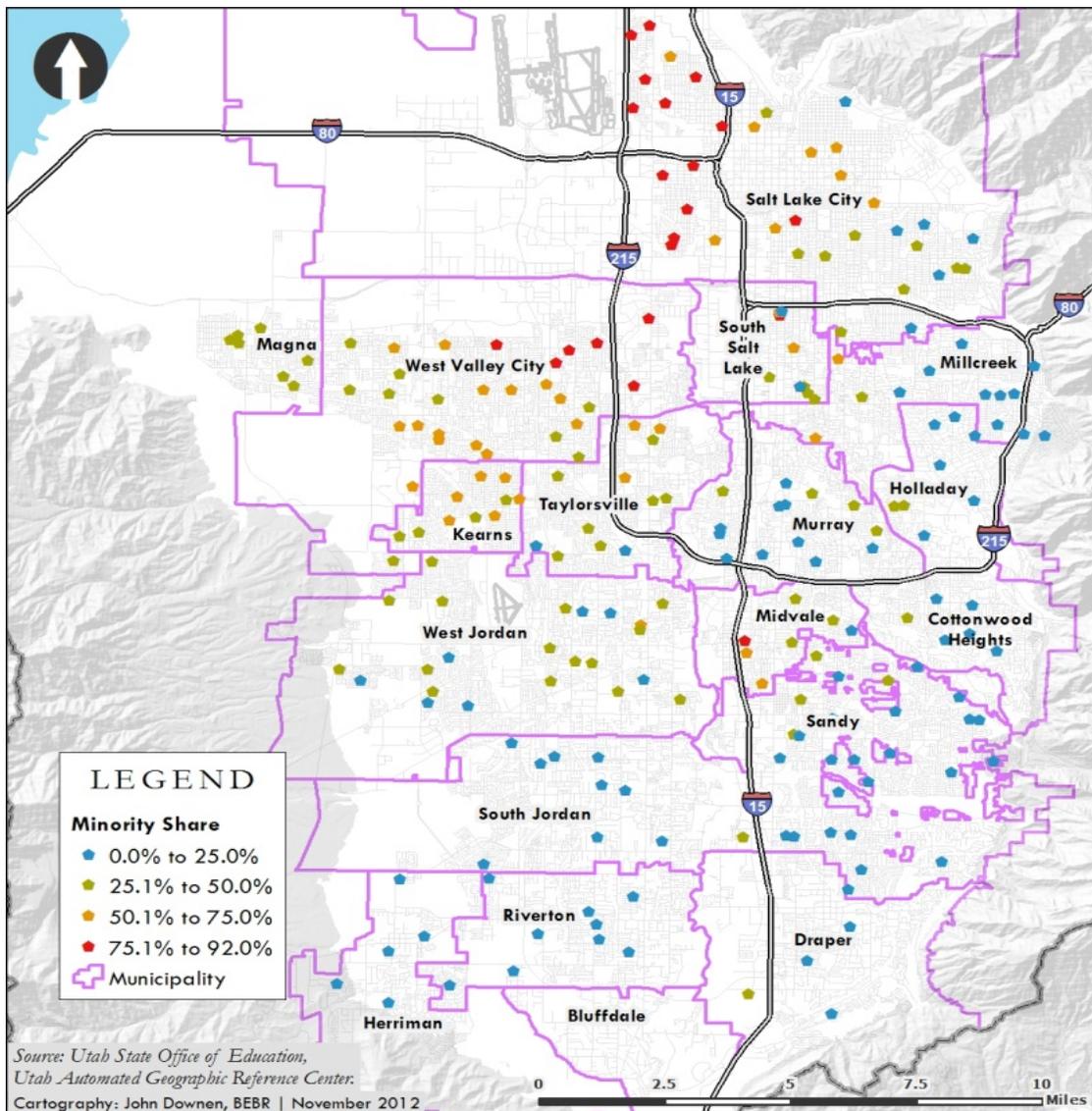
Source: BEBR Computations from Utah State Office of Education

Figure 9
Fall Minority Enrollment in Salt Lake County, 2007 & 2011



The minority share of the student body at each public school in Salt Lake County is shown in *Figure 10*. Blue dots represent schools with less than a quarter of the students identified as a minority, green represents between a quarter and a half of the students are considered a minority, orange is between half and three-quarters minority students, and red represents from three quarters to the highest concentration of minority students of 92 percent. Of course the schools with the highest percentages of minority students reflects the overall minority composition of cities and neighborhoods west of Interstate 15. More specifically, the highest shares of minority students are in schools in Salt Lake City’s River District and the eastern half of West Valley City. The schools denoted by the red dots are at risk of curriculum dilution, lower rates of student and school achievement, and less parental involvement.

Figure 10
Minority Share of Enrollment in Public Schools in Salt Lake County, 2011

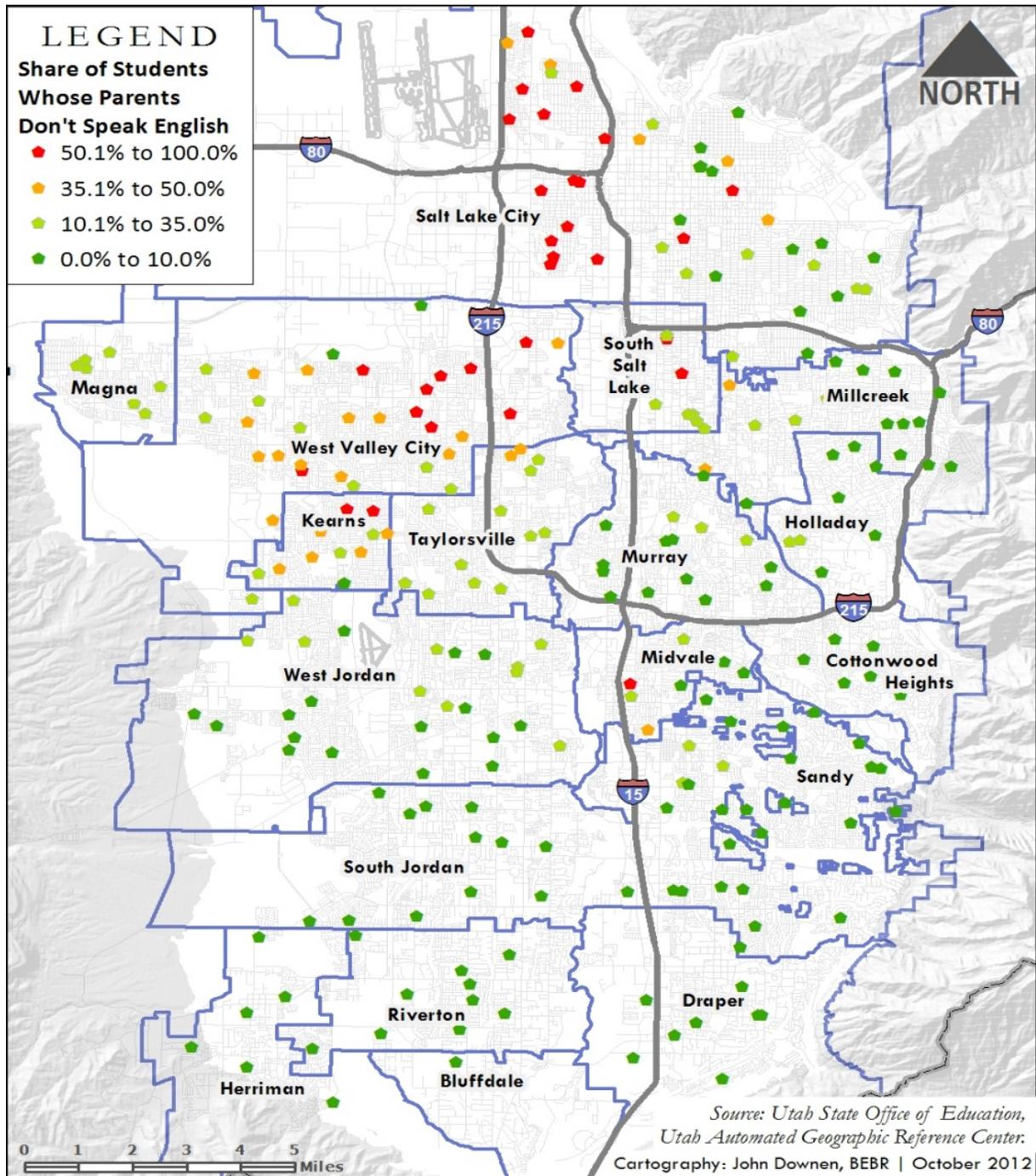


Chronic Absenteeism – Chronic absenteeism is a more likely characteristic of low-income, minority students. Chronic absenteeism is defined as absent, for any reason, 10 percent of the time. A recent study by the Utah Education Policy Center, University of Utah *Chronic Absenteeism* reports that 13.5 percent of the students in Utah’s public schools are chronically absent. Students in low-income households are 90 percent more likely to be chronically absent than non-poor students. Low-income in the study was defined as students qualifying for free or reduced lunch. To qualify for free lunch a student’s family income must be less than 130 percent of poverty and for reduced lunch 185 percent of poverty. Undoubtedly for those families with incomes below the poverty line chronic absenteeism is even more prevalent. To a lesser degree minority students are also more likely to be chronically absent. Minority students are 40 percent more likely to be chronically absent than non-minority students. These findings underscore again the relationship between student achievement and performance and the income and racial characteristics of those students.

Limited English Proficiency (LEP) – One typical characteristic of opportunity-poor areas of the county is the concentration of households in which adults have Limited English Proficiency. LEP concentrations are part of the bundle of characteristics intrinsic to high concentrations of minority populations. Often adults with LEP are less likely to be involved in the education of their children. Consequently educational attainment and opportunities for their children may be reduced and the educational effectiveness of the school diminished. High rates of LEP indicate a need for service and program sensitivity for this protected class (national origin).

The percentage of the student body with parents that have a Limited English Proficiency (LEP) at public schools in Salt Lake County is shown in *Figure 11*. LEP is measured by the percentage of students at a school whose parent’s primary language at home is something other than English. A red dot represents the highest percentage, more than half of the student body has parents with LEP. An orange dot represents 35.1 to 50 percent, a light green represents 10.1 to 35 percent, and a dark green dot represents under 10 percent of the students have LEP parents. Similar to the locations of minority students, the schools with the highest number of students with LEP parents are in the northwest quadrant of the city concentrated in Salt Lake City’s River District and the eastern half of West Valley City. The lowest concentrations are in the east side and southwest section of the county.

Figure 11
Share of Students with Parents of Limited English Proficiency in Salt Lake County, 2010



According to data from the county public schools, there are concentrated areas of both high and low levels of LEP throughout the county. For example, Rivers Edge School in South Jordan does not have any students whose parents' primary language at home is anything other than English, whereas Monroe School in West Valley City has over 70 percent of its students who come from homes where the primary language spoken is a language other than English. The areas of high concentrations of LEP households match the opportunity-poor areas of the county.

Figure 12 shows the ten highest and lowest percentages of students whose parents speak a language other than English. The lowest 10 schools are all located in South Jordan, Bluffdale, Riverton, Sandy, and Herriman. The ten highest percentage schools are in West Valley City, South Salt Lake and Salt Lake City. These extremes are representative of the overall county with the higher percentage of LEP rates being west side—River District neighborhood of Salt Lake City—and the Granger and Hunter neighborhoods of West Valley City. The lower LEP rates tend to be along the east side of the county and in the southern suburbs of the county. Figure 13 shows a gradient chart of all 226 public schools in Salt Lake County; 107 schools have a rate of less than 10 percent of their student body with LEP parents, only 57 of those are in the bottom quartile. The average percentage of students with LEP parents for the entire county is 21.5 percent. Thirty of the county schools have over half of their students with LEP parents.

Figure 12
The Ten Lowest and Highest Rates of Students with
LEP Parents in Salt Lake county, 2010

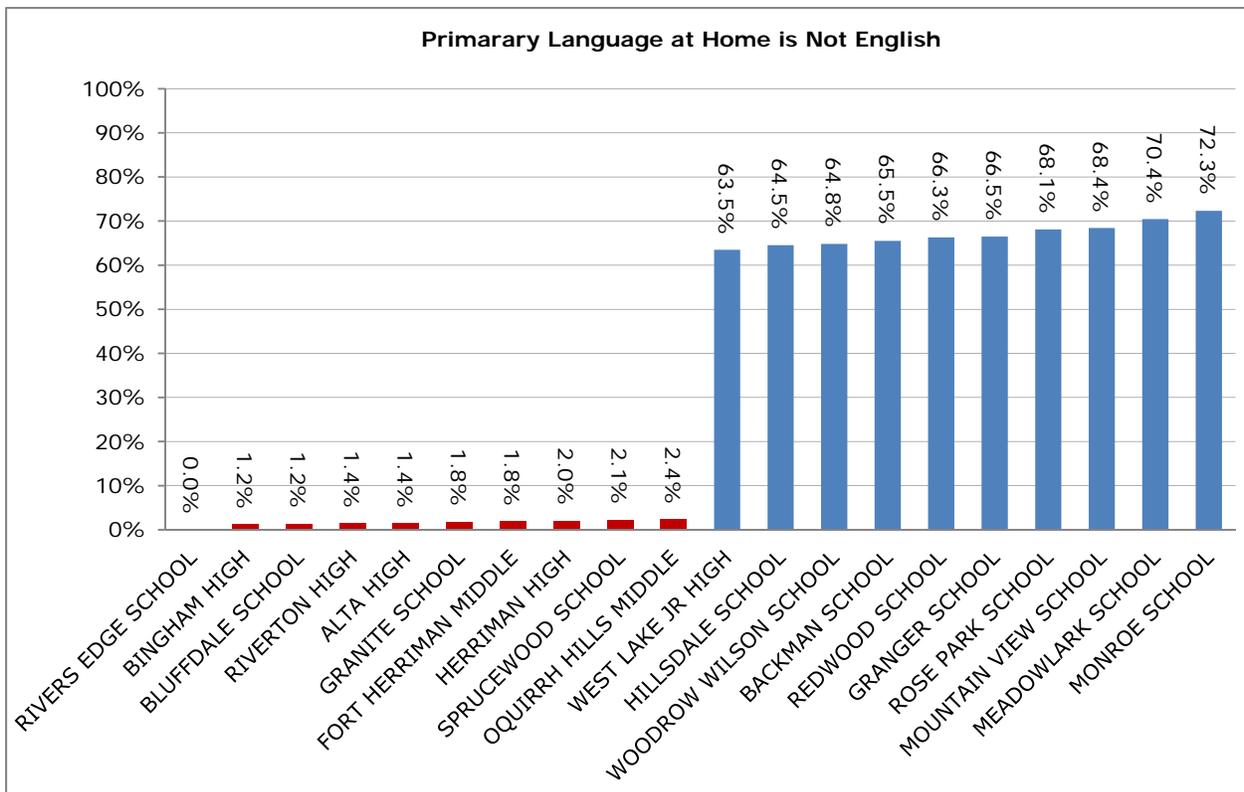
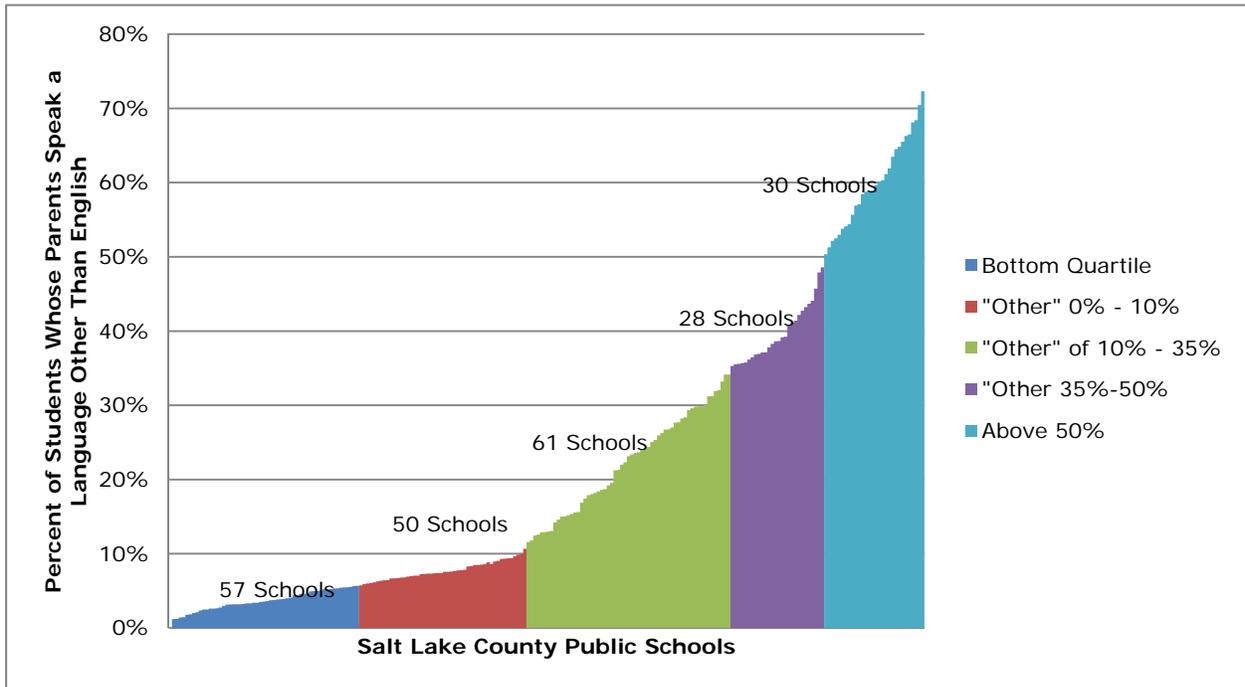


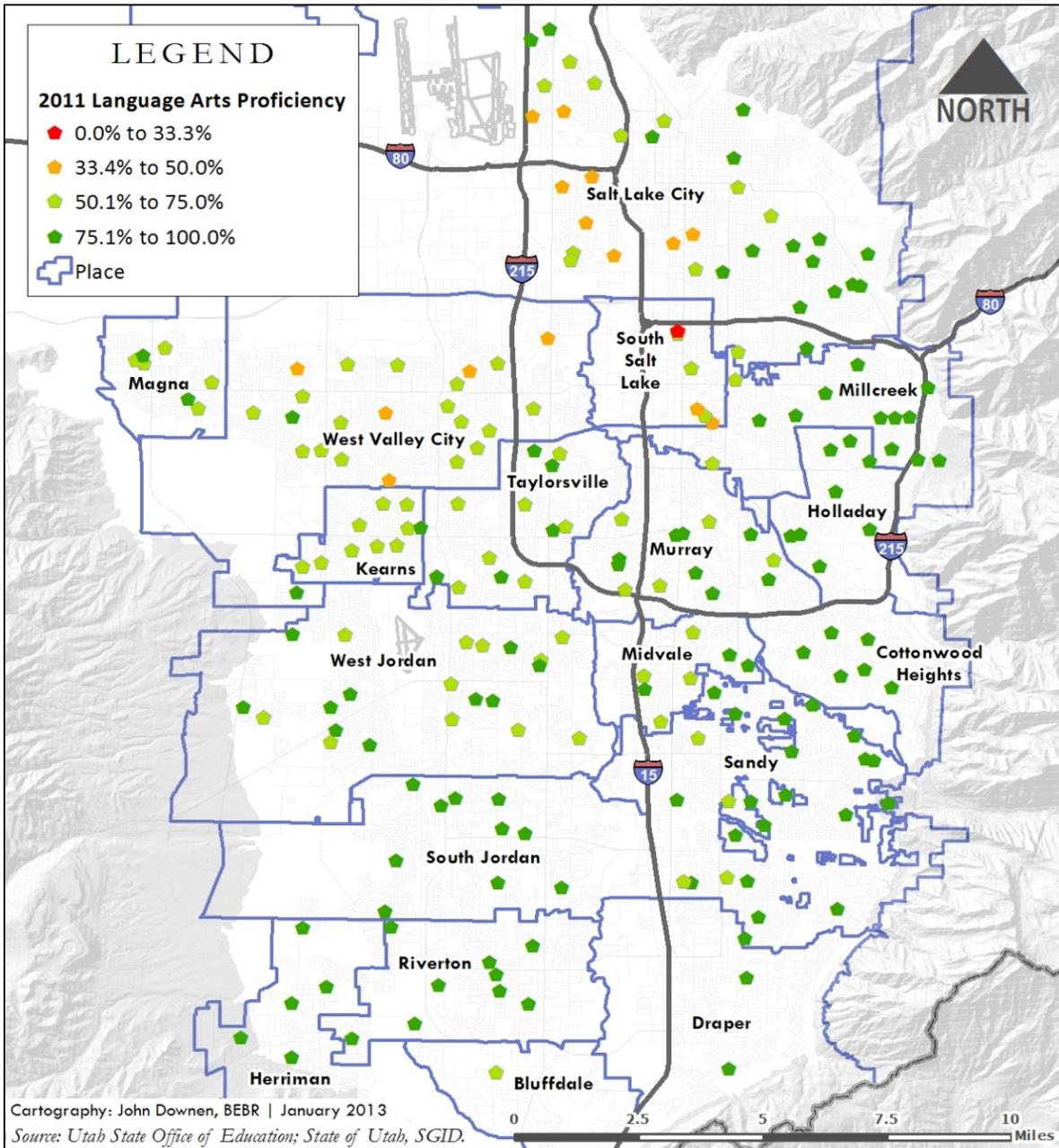
Figure 13
Percent of Students with LEP Parents in Salt Lake County Public Schools, 2010



School Proficiency — Low-income, high concentrations of poverty, and limited English proficiency of parents do appear to have an effect on school and student performance. In the areas where these characteristics persist school achievement seems to suffer as shown by data from the Utah State Office of Education. The percent of the student body proficient in language arts for each public school in Salt Lake County in 2011 is shown in *Figure 14*. Proficiency is measured for all three education levels, elementary, middle, and high school. Elementary schools were measured using 5th grade language arts as a proxy, middle schools with 8th grade language arts, and high school is a composite of 9th to 11th grade language arts.

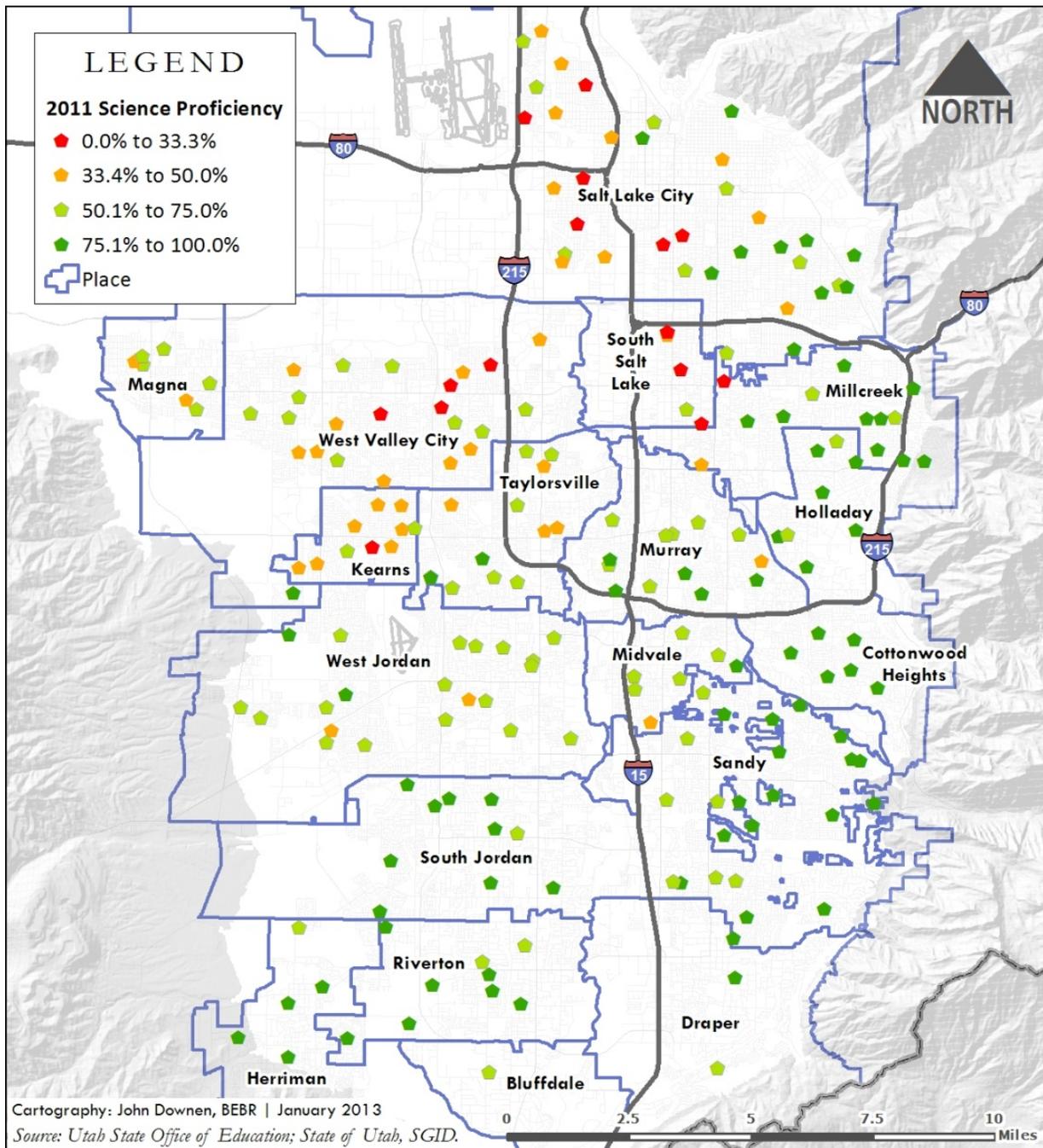
The lowest performing schools, those with less than a third of the student body proficient in language arts, are shown in red. Schools with 33.4 to 50 percent proficiency are orange. Schools between 50.1 and 75 percent proficient are light green, and schools with more than three quarters of the student body proficient are dark green. Not surprisingly, the highest performing schools tend to be on the east side and southwest Salt Lake County. The schools with lowest proficiency are located in Salt Lake City, South Salt Lake, and West Valley City.

Figure 14
Language Arts Proficiency in Public Schools in Salt Lake County, 2011



The percent of the student body proficient in science for each public school in Salt Lake County in 2011 is shown in *Figure 15*. Proficiency is measured for all three school levels. Again, the highest performing schools tend to be in the east side and southwest Salt Lake County.

Figure 15
Science Proficiency in Public Schools in Salt Lake County, 2011



Crime Rates

Access to opportunity and neighborhood stability is affected by crime rates. High crime rates negatively impact housing prices, quality of the housing stock, student and school proficiency, commercial development, and social environment. The most recent data show that those cities in the county with heavy concentrations of minorities, renters, and low-income households also have the highest crime rates. Salt Lake City, South Salt Lake, West Valley City, and Taylorsville represent

four of the five highest crime rate cities in the county. The high crime rates further compounds the disparity in opportunity for these cities *Table 12*.

Table 12
Crime Rate by Cities in Salt Lake County

	Crime Rate/1,000 Population*
Salt Lake City	73.77
South Salt Lake	70.58
Murray	68.36
West Valley City	44.72
Taylorsville	44.66
Sandy	30.4
Cottonwood Heights	29.82
West Jordan	29.81
Draper	21.5
Bluffdale	19.63
South Jordan	19.27
Midvale	18.15
Salt Lake County	46.19

**Homicide, rape, robbery, aggravated assault, burglary, larceny, motor vehicle theft, arson.*

Source: Utah Department of Public Safety, Crime in Utah 2011.

Child Care Enhances Opportunity

Available child care is an important component of opportunity. The licensed childcare centers in Salt Lake County by enrollment capacity are shown in *Figure 16*. The size of the dots represents the maximum capacity of the centers. Access to daycare can be considered an advantage in terms of fair and equitable housing, as well as access to opportunity. If a household relies on low-wage jobs for stability, affordable childcare enables adults to take on full-time positions. Similarly, without access to childcare, more parents will be forced to stay at home with their children, thereby forgoing potential income.

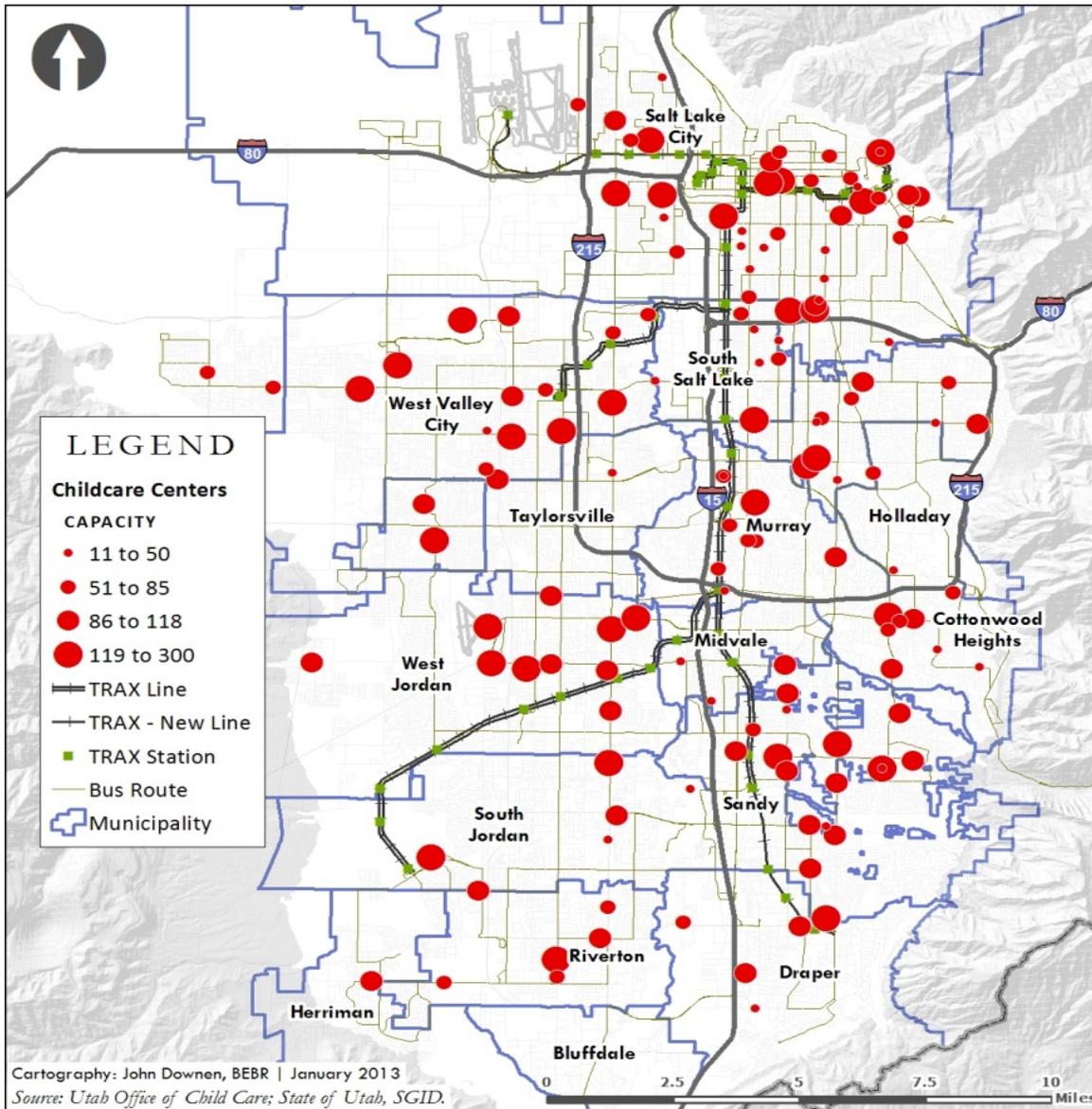
As a result, the lack of adequate childcare can restrict a family’s mobility and the time they can invest in opportunities outside the home. Thus, the availability of childcare access could restrict opportunities for minorities, larger families, and low-income households.

Childcare centers are distributed across the county in almost every city. However, the largest concentrations of childcare facilities tend to be in Salt Lake City and along the east side of the county. For the most part, childcare facilities tend to be along the major roads with bus routes. However, this does not necessarily mean they are readily accessible or in proximity to low-income and minority residents. Some notable areas with few facilities are Midvale and South Salt Lake. These cities have concentrations of poor residents that would need these childcare facilities near public transportation given that they likely rely on public transit more heavily than other residents.

Much like the centers on the east side, most of the childcare facilities west of Interstate 15 are along major roads and bus routes. However, the centers on the west side of the county tend to have larger capacity but are sparsely distributed. This can limit the opportunities available to low-income and minority residents living in the county as the west side is where a majority of the low-valued homes,

large-family rental households, and minorities are located. As a result, there appears to be some disparity in the childcare opportunities available to low-income residents and minorities in the county.

Figure 16
Childcare Centers in Salt Lake County, 2010



Each dot represents childcare centers only, and does not include any licensed family or residential certificate providers. Those providers are protected under GRAMA and their location is not public information, however, each licensed provider in a private residence may have up to three children in their care.

Housing Affordability and Stability

An overwhelming majority of the homes valued above \$250,000 are located on the east side of Interstate 15 and south of West Jordan *Table 17*. Not only are high-valued homes located in predominantly non-Hispanic white neighborhoods, they are in the densest concentrations along the foothills and just outside the downtown urban centers of the cities in higher opportunity tracts. The

dense concentration of high-valued homes in these areas limits the options for low-income, minority, and other protected class residents to find adequate and affordable housing. This results in further concentration of the poor and minority residents of Salt Lake County, increasing the inequality in access and opportunity in the county.

Figure 17
Assessed Value of Detached Single-Family Homes in Salt Lake County, 2011

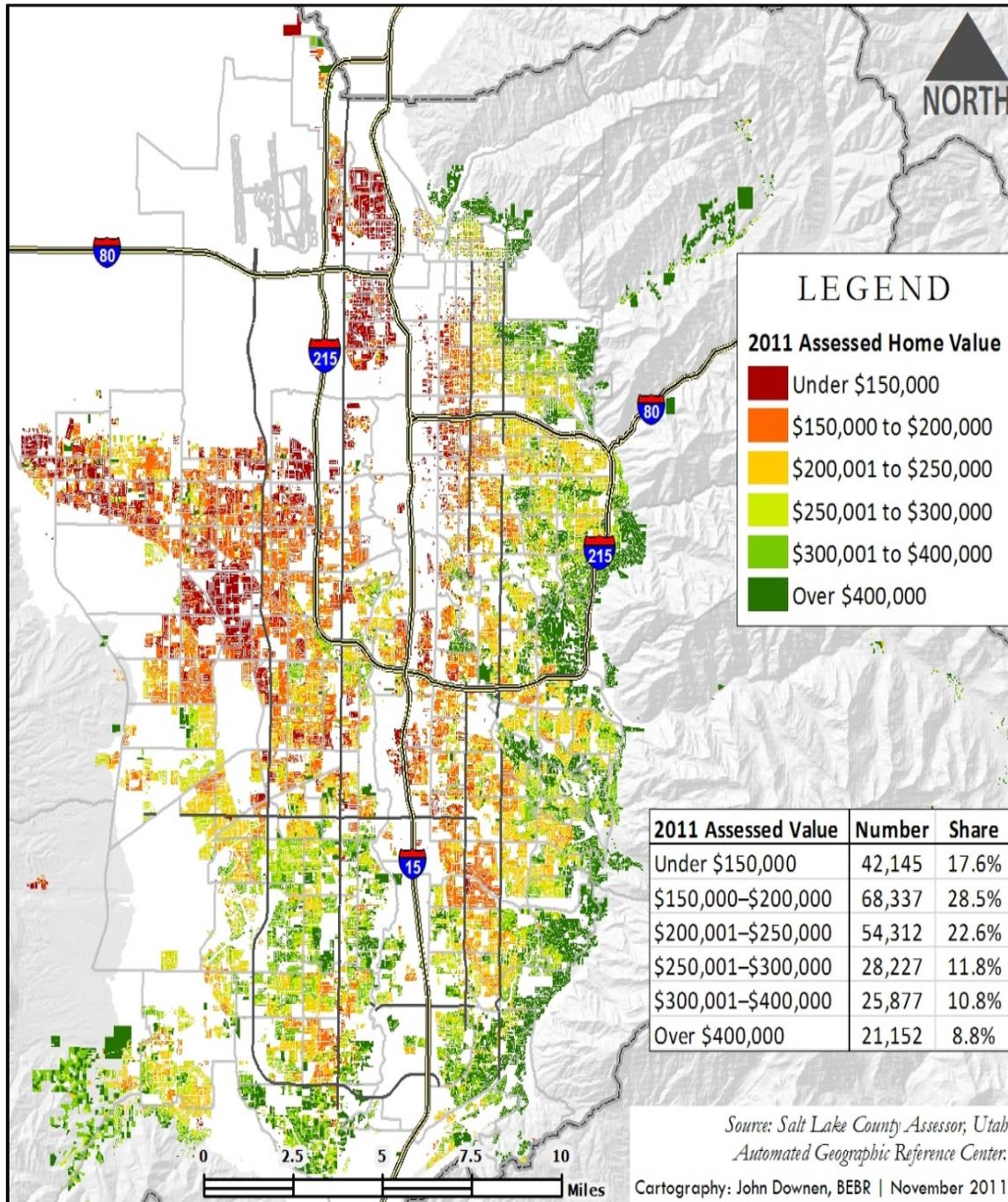
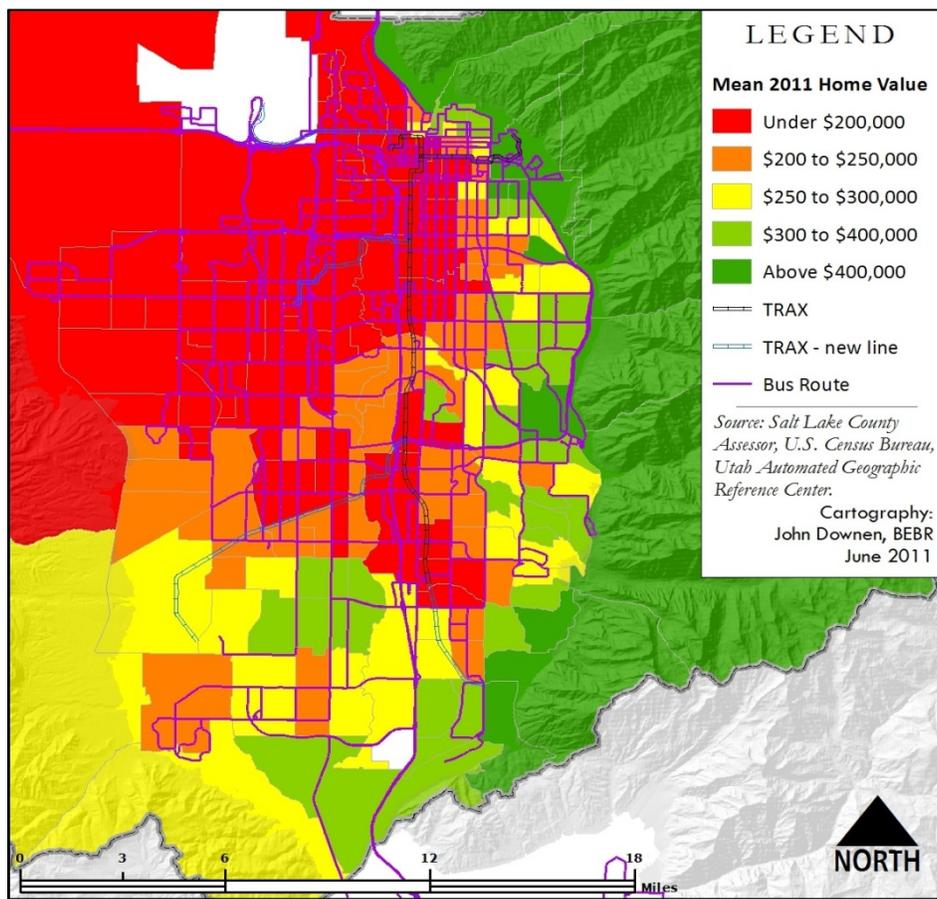


Figure 18 maps the mean home value in 2011 by census tract in Salt Lake County. This figure shows a very clear division of low- to high-valued homes from the northwest quadrant to southeast corner of the county. With the exception of central South Jordan, Bluffdale, and Herriman no tract west of Interstate 15 has a mean home value above \$300,000. Other trends that follow this same pattern are the bus routes and public transit options. For the most part, the options become fewer the farther south and east the tract is located. As a result, there are many fewer transportation options available to lower-income and minority residents hoping to live in the higher-opportunity tracts on the east side. Of course, public transportation routes are determined in part by potential ridership, and opportunity rich cities have less potential due to high rates of automobile ownership. Consequently, for the most part, high home value neighborhoods have fewer public transportation options, particularly bus service. The exceptions would be the TRAX lines to Daybreak, Sandy, and Draper. Over time the transit opportunities and use of TRAX should be complemented with affordable rental and owner-occupied housing targeting low and moderate income families. Otherwise the full social value of TRAX lines will not be realized.

Figure 18
Median Home Value by Tract in Salt Lake County, 2011



Foreclosures — Foreclosures are not only traumatic for the home owner but often have a negative effect on real estate values, housing stability, and the quality of the housing inventory; all characteristics that can increase disparities in opportunity. Since 2008, 2.3 percent of the owner-occupied housing stock in Salt Lake County has been sold as REO property or foreclosed homes. This estimate was derived from total REO sales between 2008 and 2012 from the Wasatch Regional

Front Multiple Listing Service, and the total owner-occupied homes from the 2010 U.S. Census. The highest share of foreclosed homes was in zip code 84020, which is primarily located in Draper. In this zip code 4.23 percent of homes went through foreclosure. The lowest rate of foreclosure was in zip code 84108, which had only about three-fifths of a percent of owner-occupied units in foreclosure *Table 13*.

Table 13
Foreclosed Homes in Salt Lake County, 2008-2012

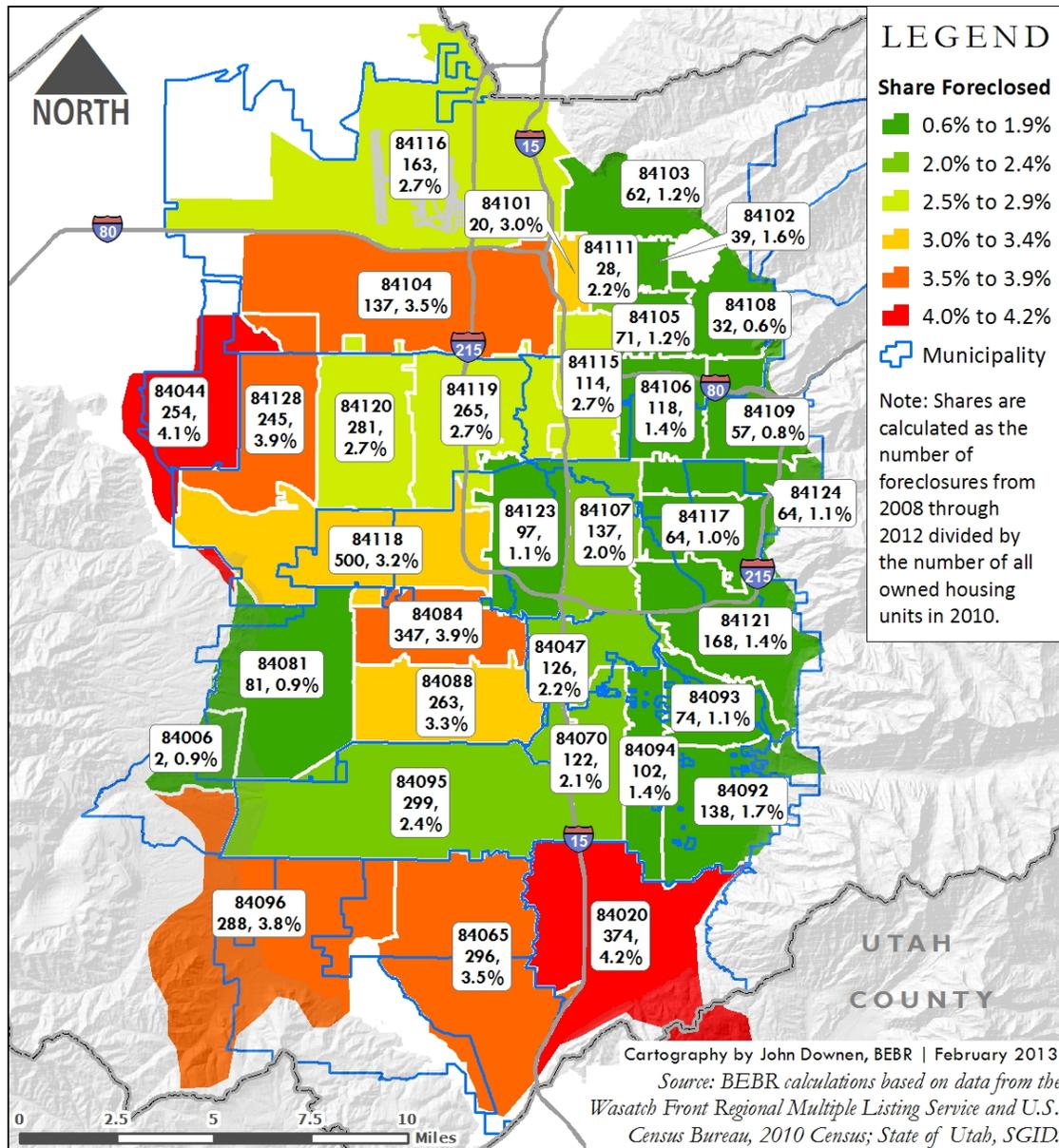
City	Zip Code Tabulation Area	Total Owned Units	Total Foreclosures for 2010 ZCTA (2008-2012)	Share of Foreclosed Homes
Bluffdale/Riverton	84065	8,534	296	3.47%
Cottonwood Heights (and Big Cottonwood)	84121	11,692	168	1.44%
Draper	84020	8,852	374	4.23%
Herriman	84096	7,597	288	3.79%
Holladay	84117	6,588	64	0.97%
Magna Township	84044	6,194	254	4.10%
Midvale	84047	5,739	126	2.20%
Millcreek/Parley's Canyon	84109	6,773	57	0.84%
Murray	84107	6,925	137	1.98%
Salt Lake City Total		39,134	670	1.71%
Salt Lake City	84101	657	20	3.04%
Salt Lake City	84102	2,401	39	1.62%
Salt Lake City	84103	4,968	62	1.25%
Salt Lake City	84104	3,926	137	3.49%
Salt Lake City	84105	5,761	71	1.23%
Salt Lake City	84111	1,302	28	2.15%
Salt Lake City	84112	1	0	0.00%
Salt Lake City	84113	0	0	—
Salt Lake City	84116	5,944	163	2.74%
Salt Lake City (and Emigration)	84108	5,648	32	0.57%
Salt Lake City (and Millcreek)	84106	8,526	118	1.38%
Sandy Total		28,234	436	1.54%
Sandy	84070	5,922	122	2.06%
Sandy (and Little Cottonwood)	84092	8,318	138	1.66%
Sandy	84093	6,738	74	1.10%
Sandy	84094	7,256	102	1.41%
South Jordan	84095	12,490	299	2.39%
South Salt Lake	84115	4,173	114	2.73%
Taylorsville Total		24,345	597	2.45%
Taylorsville	84123	8,509	97	1.14%
Taylorsville (and Kearns)	84118	15,836	500	3.16%
Unincorporated (Brigham Canyon)	84006	228	2	0.88%
Unincorporated (Millcreek/Mt. Olympus)	84124	6,034	64	1.06%
West Jordan Total		26,114	691	2.65%
West Jordan	84081	9,353	81	0.87%
West Jordan	84084	8,868	347	3.91%
West Jordan	84088	7,893	263	3.33%
West Valley City Total		26,302	791	3.01%
West Valley City	84119	9,704	265	2.73%
West Valley City	84120	10,246	281	2.74%
West Valley City	84128	6,352	245	3.86%
Salt Lake County		235,948	5,428	2.30%

Zip Code 84129 had a total of 25 foreclosed homes since its incorporation in 2011. However, this table uses the 2010 Zip Code Tabulation Areas (ZCTAs) from the 2010 Census, and therefore does not include 84129. However, this zip code was formed from parts of zip codes 84118, 84119 and 84084. There are 10,324 single-family parcels in 84129. Of these, 2,090 are in ZCTA 84084, 7,147 are in 84118, and 1,087 are in 84119. Assuming the 25 foreclosures in 84129 since July 2011 were evenly distributed across the area, these numbers are used to weight these foreclosures to the other/older zip codes. Thus the County totals should still equal the accurate total number of foreclosures, and ZCTA's 84118, 84119 and 84084 have 17, 3 and 5 additional foreclosures, respectively, added that are currently in the 84129 zip code.

Source: BEBR Calculations From Wasatch Front Regional Multiple listing Service and U.S. Census Bureau, 2010 Census

Figure 19 maps the share of the foreclosed homes in each zip code in Salt Lake City. Generally, the east side has a much lower foreclosure rate than the west. Surprisingly, the southernmost zip codes in cities like Draper, Herriman, and Bluffdale actually have some of the highest foreclosure rates in the county, more akin to some of the northwest zip codes in Salt Lake City and West Valley City. This is most likely due to the large number of new homes built in the southern portion of the county during the pre-recession boom that were lost to foreclosure by either an overextended builder or home owner.

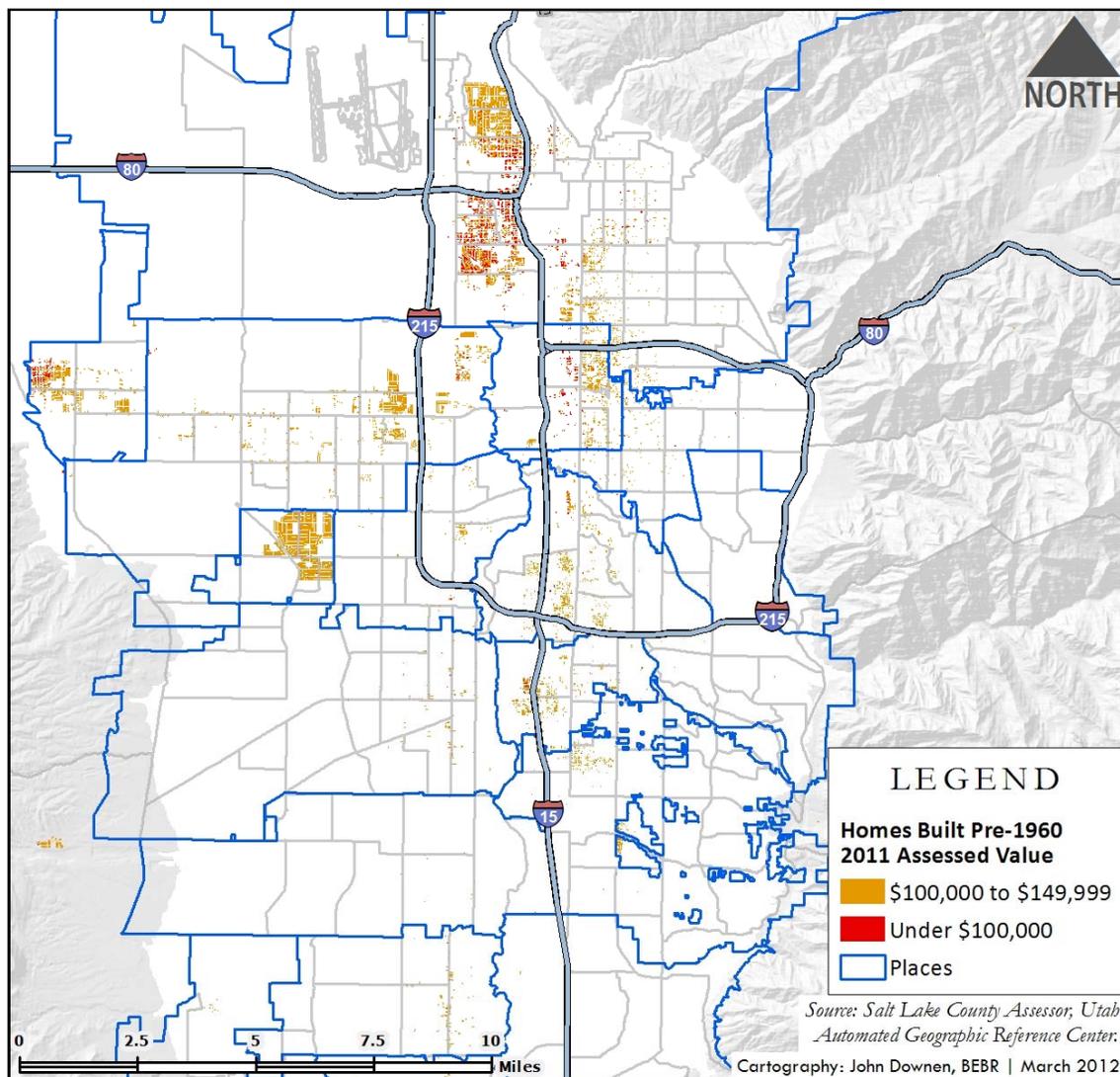
Figure 19
Share of Foreclosed Owned Housing Units, 2008-2012



Deteriorating Housing Stock — The deteriorating condition of the housing stock can impose significant costs on low-income households and be a detriment to opportunity. Such households often do not have the financial means to move, therefore they have little choice but to endure poor

quality housing, which often results in high energy costs. The most vulnerable homes are older, low value homes. *Figure 20* shows the homes throughout Salt Lake County that were built prior to 1960 and are valued at less than \$150,000. In Salt Lake City the neighborhoods of Rose Park, Poplar Grove and Glendale have a majority of older, low-valued homes with a high risk of deteriorating quality and high energy costs. In the county the two areas of concentration of older, low-valued homes are Kearns and Magna. Both the city and county and some nonprofit organizations (Habitat for Humanity, Neighbor Works Salt Lake, CAP) have programs to address the potential housing quality problems and high energy cost of residents in these neighborhoods. For residents who do not have the choice of moving, improving the quality of their existing housing is a creditable substitute.

Figure 20
Concentrations of Deteriorating Housing Inventory



Food Deserts

The U.S. Department of Agriculture has recently published the *Food Access Research Atlas*, a mapping tool that allows the user to map by census tract food deserts. This tool incorporates the USDA

definitions of what foods are healthy and nutritious, food affordability, where those foods are available, consumer travel patterns, consumer income, car ownership and availability of public transportation. A food desert is defined by income, accessibility (more than one mile), and vehicle ownership.

The increase in chronic diseases such as heart disease, diabetes and obesity that may be linked to poor diets are major health concerns. There is some evidence that the incidence of these diseases is more prevalent in poor areas that have limited access to affordable and nutritious food. Individuals in poor neighborhoods are more often reliant on food retailers and fast food restaurants that have a limited variety of fresh, healthy food.

It should be noted that research on the link between chronic diseases and the neighborhood food environment is still inconclusive. Substantial literature shows that low-income minority households are disproportionately at risk for chronic diseases but the gap between disease and the role of accessibility to healthy foods within one mile is less clear. Notwithstanding these reservations it is instructive to show those areas in Salt Lake County that have been identified as food deserts. *Figure 21* shows food deserts based on low-income—defined as less than 80 percent of the metropolitan area’s median family income (Salt Lake Metropolitan Area – 80 percent = \$52,800) and accessibility, i.e. within one mile of healthy, nutritious food retailer. The large census tract west of the Salt Lake International Airport and the east tract at the University of Utah are not of serious concern. The former has very few residents and the latter is populated primarily by low-income student families.

The food deserts identified in *Figure 21* show that the Rose Park, Fair Park, Poplar Grove, and Downtown Salt Lake City qualify as food deserts in Salt Lake City. However, the downtown area’s limited access has probably been corrected with the recent opening of the Harmon’s on 100 South and State Street. South Salt Lake City and part of Taylorsville qualify as food deserts, as does a west tract in West Valley City. Some tracts west of I-15 in Midvale are also identified as food deserts but as is the case with downtown Salt Lake City, the recent opening of Winco at 700 West and 7000 South has improved food access.

Figure 22 adds the attribute of no vehicle to low-income and one mile accessibility. The pattern under this set of attributes is very similar in Salt Lake City but does reduce the tracts in Rose Park but increases tracts in the downtown area and adds a tract in the West Capitol neighborhood. Fewer tracts in South Salt Lake and Taylorsville are food deserts in *Figure 22* and the West Valley City tract is eliminated. Midvale tracts are unchanged.

The areas of most concern appear to be South Salt Lake and the Rose Park, Fair Park, and Poplar Grove neighborhoods of Salt Lake City. Policy approaches to food deserts have been developed in communities around the country. The most often used approach has been to use a number of federal financing and incentive programs to encourage new store development. Examples of these programs include new market tax credits, CDBG funds, Empowerment Zone Program and HUD’s Section 108 Loan program (loan guarantee for economic development).

Figure 21
Food Deserts in Salt Lake County, 2010
 (Low-Income Household and Accessibility Exceeds One Mile)

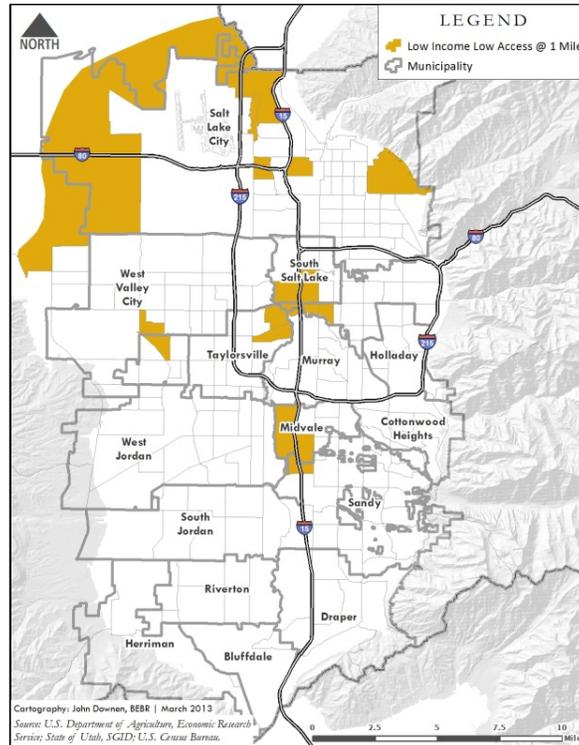
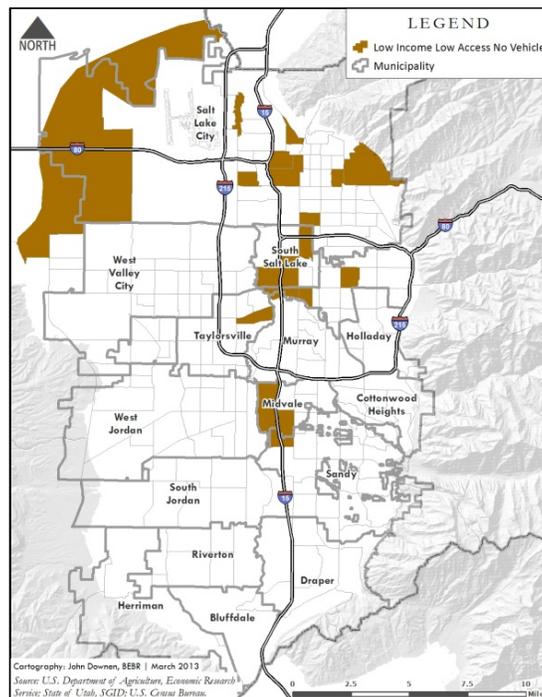


Figure 22
Food Deserts in Salt Lake County, 2010
 (Low-Income Household, Accessibility Exceeds One Mile, and No Vehicle)



Health Professional Shortage Areas and Medically Underserved Areas/Populations

The U.S. Department of Health and Human Services designates health professional shortage areas (HPSA) and medically underserved areas/populations (MUA/P) by county and census tract. HPSAs are defined as having a shortage of primary medical care, dental, or mental health providers. HPSAs are designated using several criteria, including population-to-clinician ratios. The ratio is usually 3,500 to 1 for primary care, 5,000 to 1 for dental health care, and 30,000 to 1 for mental health care. MUA/Ps adds the attributes of infant mortality, high poverty, and/or elderly population to these criteria. HPSAs are identified as southwest Salt Lake City, South Salt Lake, much of West Valley City and Taylorsville, Magna, Kearns and Midvale *Figure 23*. The MUAs/Ps are limited to west side Salt Lake City, the downtown area and east Midvale *Figure 24*. Using the HHS designations access to healthcare for residents of these areas would likely be more difficult. Thus health care access becomes another factor limiting opportunity for low-income and minority households in Salt Lake City, Midvale, West Valley City, Magna, and Kearns.

Figure 23
Health Professional Shortage Areas

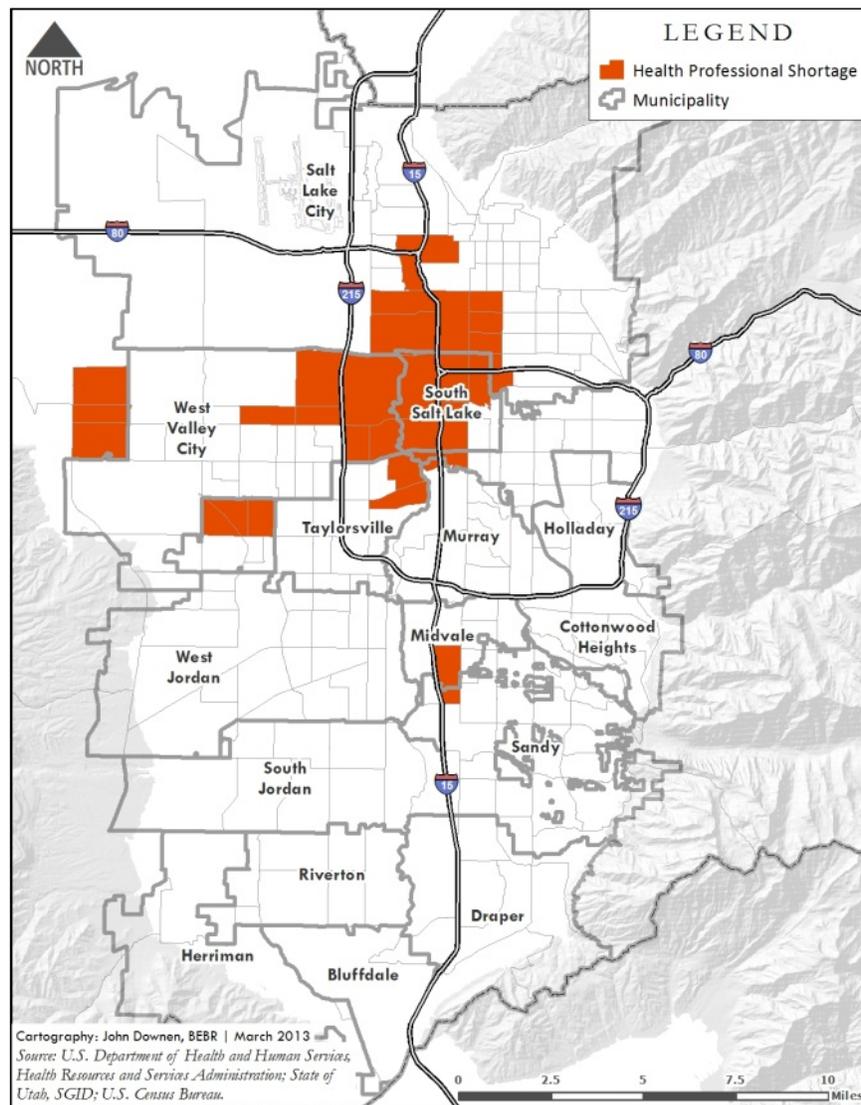
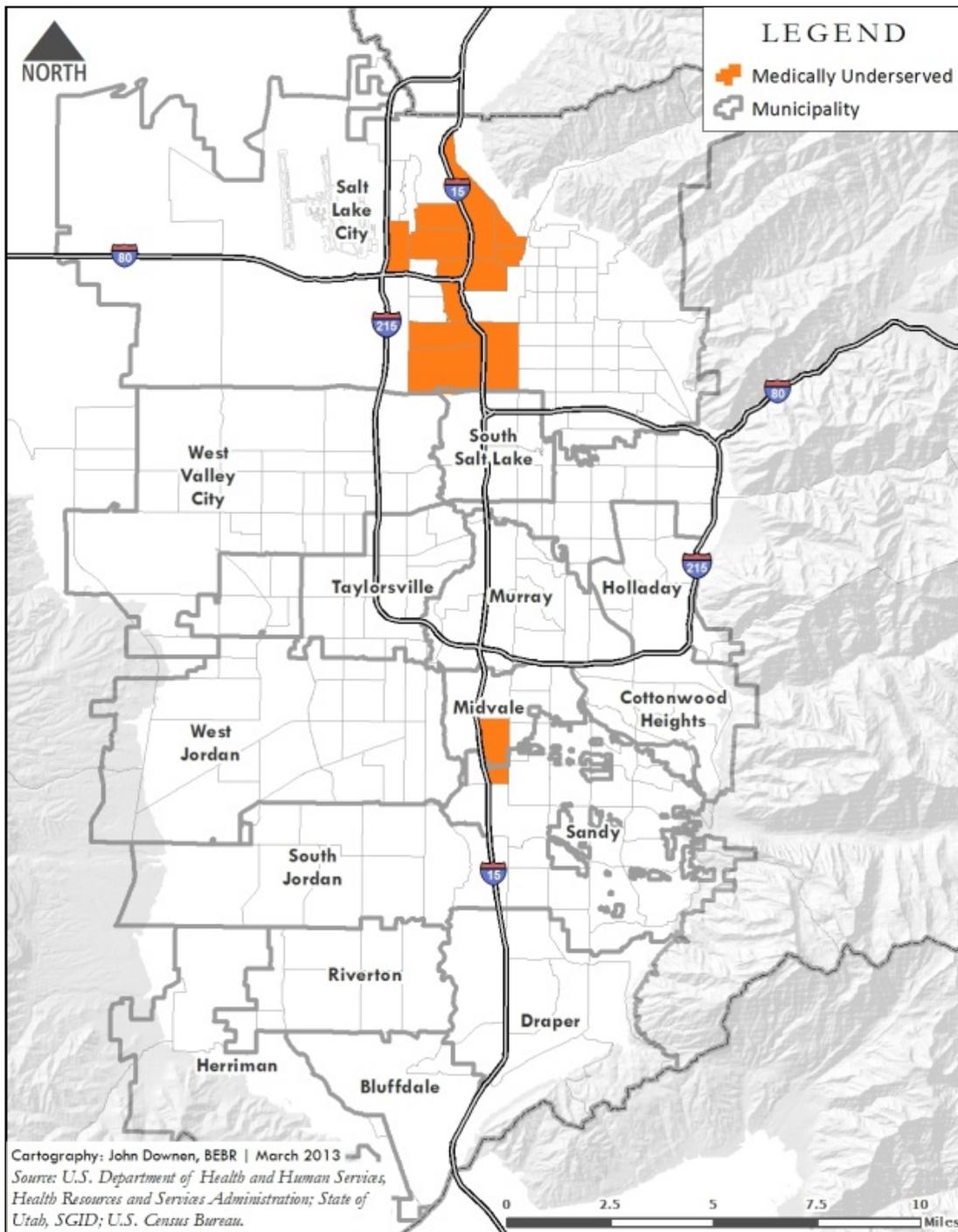


Figure 24
 Medically Underserved Areas/Populations in Salt Lake County



SECTION V PHYSICAL INFRASTRUCTURE

As of January 2014 there were fifteen federal highway projects under construction in Salt Lake County. The total countywide value of these projects is \$244,440,150 *Table 1*. The greatest benefit of these projects accrues to those who use these major roads and highways as routes for commuting to work, personal use, and commercial use, which underlies much of the economic activity of the local economy. The benefits to the protected classes in Salt Lake County are indirect and difficult to measure but without question they do benefit from the investment in highways and roads.

**Table 1
Current UDOT Construction Projects, January 2014**

County	Project	Status	Project Value	Expenditures
Salt Lake	I-15; WIDENING, 500 NORTH TO I-215	Under Construction	\$135,184,663	\$134,705,683
Salt Lake	SR-173; 5400 SOUTH BANGERTER HIGHWAY TO 4800 WEST	Under Construction	\$35,600,000	\$28,830,019
Salt Lake	I-80; MP 136 TO 143, Lambs Canyon to Kimball Jct.	Under Construction	\$13,200,019	\$11,509,693
Salt Lake	I-80; Parley's Canyon Drainage Improvements	Under Construction	\$11,800,000	\$10,905,373
Salt Lake	13400 South; 4000 West to Mountain View Corridor	Under Construction	\$8,511,956	\$8,201,247
Salt Lake	SR-154; Bangerter Hwy at 13400 South	Under Construction	\$7,212,514	\$6,225,364
Salt Lake	I-215; SR-201 to North Temple	Under Construction	\$6,500,001	\$4,127,481
Salt Lake	SR-68; California to I-80	Under Construction	\$6,175,000	\$1,230,825
Salt Lake	SR-201; NEAR KCC ARTHUR MILL RAILROAD SPUR CROSS	Under Construction	\$5,350,000	\$1,130,428
Salt Lake	Pavement Marking Warranty on Multiple Routes	Under Construction	\$5,000,000	\$3,946,156
Salt Lake	PARLEY'S CREEK TRAIL, PHASE 4 - THE DRAW	Under Construction	\$3,959,097	\$2,054,915
Salt Lake	7800 South & Airport Road	Under Construction	\$1,914,050	\$1,713,369
Salt Lake	Bicycle Safety Shoulders; GAZEX Avalanche Control	Under Construction	\$1,807,286	\$1,607,921
Salt Lake	Parley's Creek Trail Phase IV - Salt Lake County	Under Construction	\$1,736,034	\$1,714,729
Salt Lake	SRTS Cottonwood Heights 2012	Under Construction	\$489,530	\$299,715

Source: Utah Department of Transportation

Long Range Transportation Plan

In addition to current federal and state highway projects the UDOT, Utah Transit Authority (UTA), and the local Metropolitan Planning Organizations throughout the state have drafted a unified transportation plan through the year 2040. *Figure 1* shows the planned highway projects from 2011 to 2040 for Salt Lake County. The projects are classified in three phases: Phase One is to be completed from 2011 to 2020 (red), Phase Two is to be completed from 2021 to 2030 (blue), and Phase Three is to be completed from 2031 to 2040 (green). The yellow stretches are projects that are determined to be of need but are currently not yet funded. Much of the Phase One and Phase Two projects are concentrated on west side and southern county improvements. The central and western areas are in cities with high rates of minority and low-income residents, primarily in West Valley

City, Taylorsville, Kearns, and West Jordan. All of these cities have Phase One and Phase Two projects planned.

Planned Physical Infrastructure Investment of the Utah Transit Authority

Figure 2 shows the planned transit improvement projects in Salt Lake County. These transit improvements can include park and rides, rapid transit, light rail, transit hubs, and other public transit improvements that aren't highway improvements. Similar to *Figure 1*, this figure shows three phases of planned projects: Phase One is to be completed from 2011 to 2020 (red), Phase Two is to be completed from 2021 to 2030 (blue), and Phase Three is to be completed from 2031 to 2040 (green). Again, the yellow stretches are projects that are determined to be of need but are currently not yet funded. Most of the Phase One transit projects in Salt Lake County are focused on north and south running projects in the central and western half of the county. These projects will likely benefit the protected class populations in these areas. Phase Two contains more east and west routes mostly in the central and northern portion of the county. These investments will improve east west travel and have some direct benefits to minority population on the west side.

A part of UTA's fare program is the Free Fare Zone which encompasses a little less than eight square blocks of downtown Salt Lake City *Figure 3*. This Free Fare Zone includes stations providing access to public centers including Salt Lake City Public Library, the State Capital building, Temple Square, the courthouses, various shopping malls, and commercial centers. While this area does not contain much residential property, the area is a central commercial district offering a wide range of employment opportunities, educational institutions, parks, cultural attractions and other public amenities. The Free Fare Zone is a benefit to many low-income workers downtown and local residents and business however, it is uncertain if the need for such services is greater for protected classes and hence of greater benefit to them.

In addition to the Free Fare Zone and UTA public transit options, as of the summer of 2013 Salt Lake City became a member of the 501©3 non-profit organization the Green Bike SLC Bike Share program. This public-private partnership between Salt Lake City, The Salt Lake Chamber of Commerce, and the Salt Lake City Downtown Alliance allows members to share a network of bikes and bike stations around downtown Salt Lake City. Designed for short commutes the fares are: \$5 for a 24 Hour Pass, \$15 for a 7 Day Pass, or \$75 for a 1 Year Pass, all of which allows members unlimited 30 minute trips between stations for the specified time period. While the program is currently seeking expansion, the location of the bike share is limited to downtown Salt Lake City *Figure 4*. Much like the Free Fare Zone this program is designed as a part of a longer commute. It is unlikely any resident relies on the Green Bike program to commute to and from their personal residence and employment or other services. It appears much more beneficial to those who commute into downtown for work and merely seek an alternative mode of transport to reach their final destination. The purchase of a membership requires a credit card and therefore can be a barrier to low-income residents, especially of the protected classes, who do not or cannot obtain a credit card. This program has very limited benefits to protected classes.

Figure 1
Salt Lake County Highway Projects through 2040

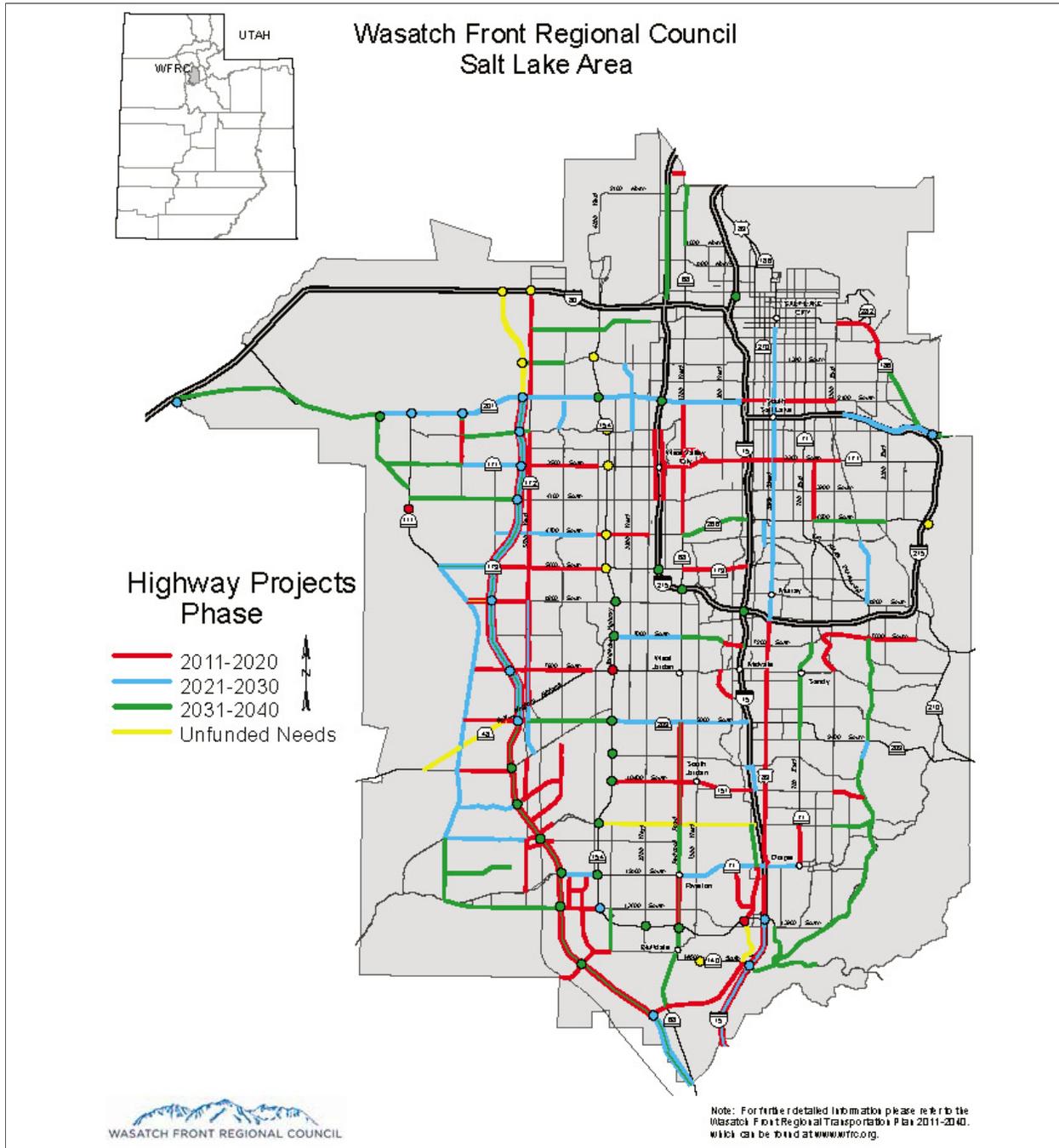


Figure 2
Salt Lake County Transit Projects through 2040

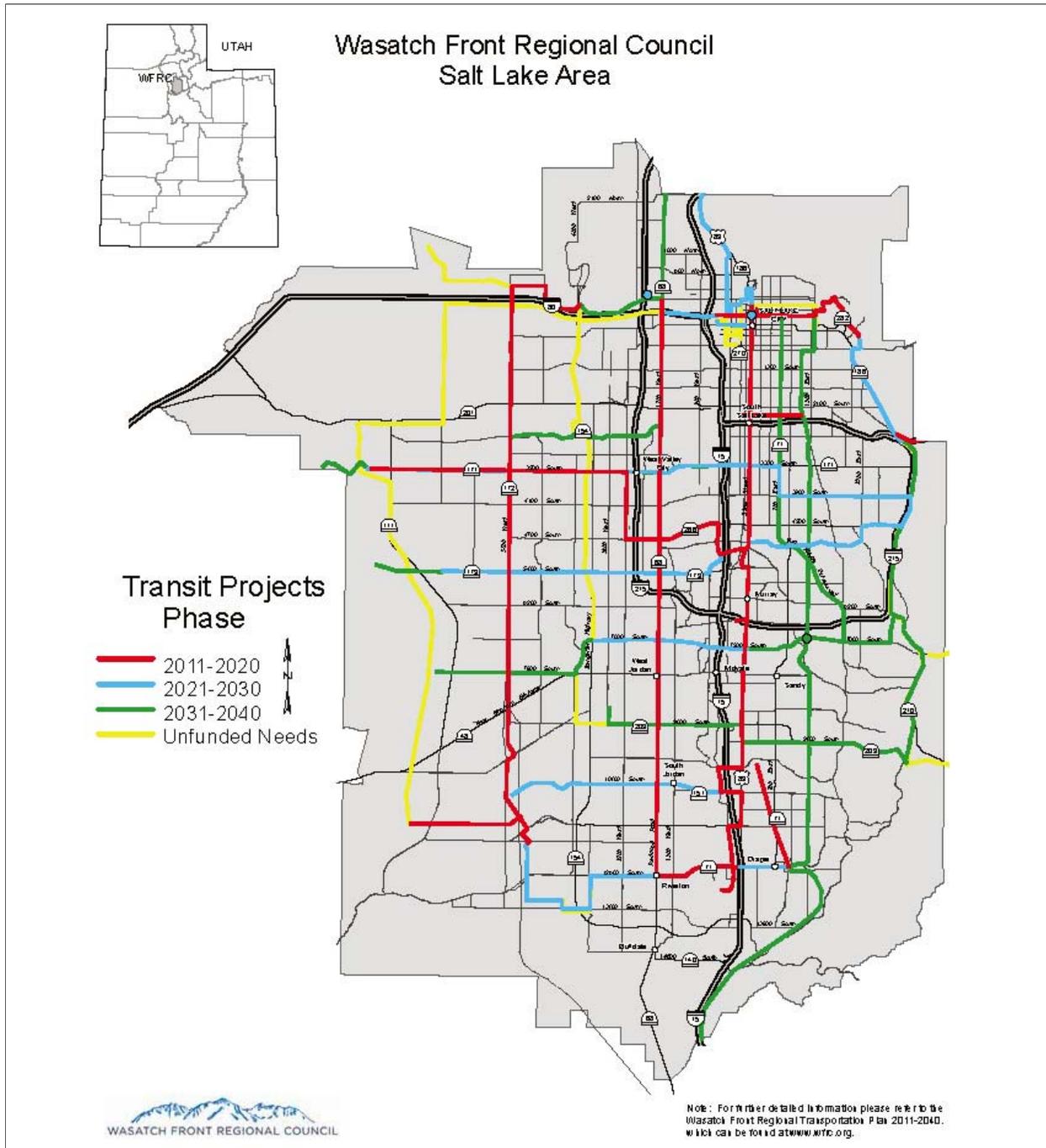
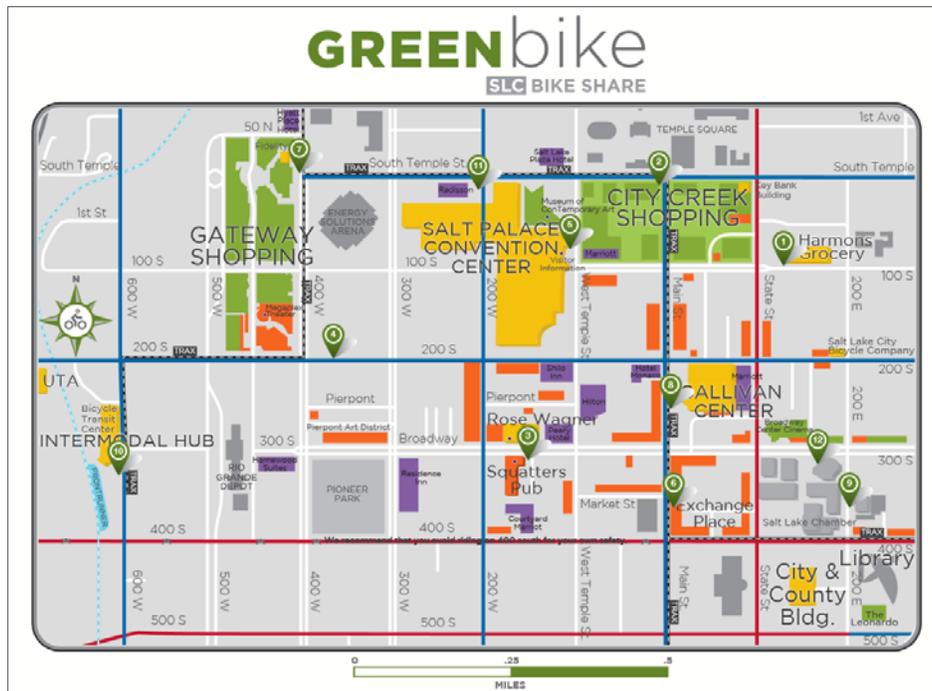


Figure 3
Salt Lake City Free Fare Zone, 2013



Figure 4
Salt Lake City Green Bike Share Map



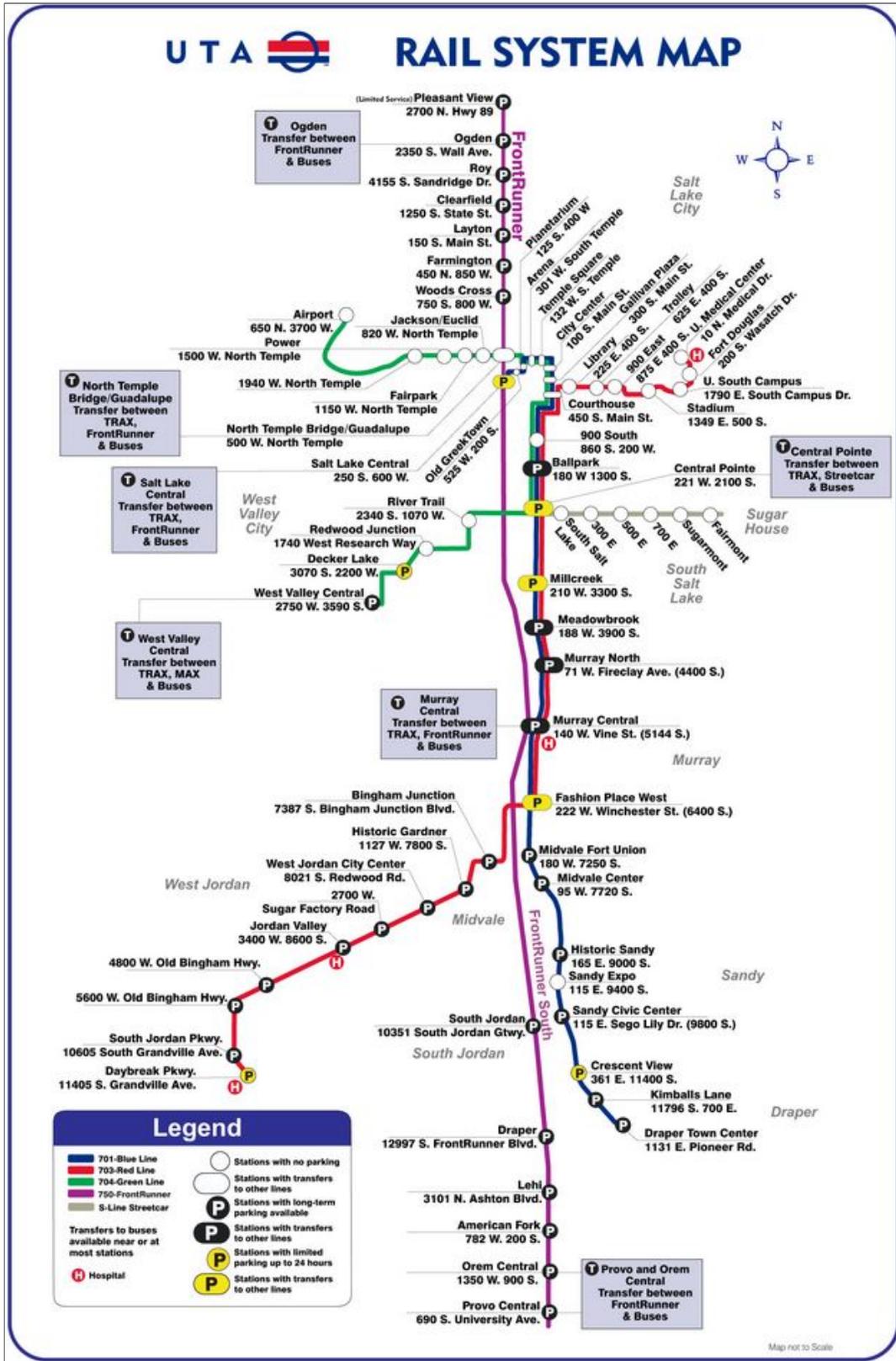
The public transit system in Salt Lake County is the largest system in the state of Utah. The main hub of UTA's public transit system is located in downtown Salt Lake City. As the system spreads from downtown Salt Lake City the number and frequency of buses and trains decreases, especially the farther south, and west, from the hub a city is located. While the central corridor of the county along Interstate 15 is served by TRAX, the number of bus routes and the frequency and operating hours of buses decreases the farther south, west, and east one goes. Bus service is excellent along the I-15 corridor, in the Salt Lake City Central Business District, and Salt Lake City. However, there are gaps in service on the west side of Salt Lake City and particularly in West Valley City, Taylorsville, Magna, and Kearns. These areas are disproportionately minority, disabled, and large family renters. The limited service is an impediment for these households and limits employment opportunity. Those needing public transportation in these areas are required to walk a few blocks to bus station, transfer at another station and walk from a stop to work, easily more than one hour for perhaps a 7-10 mile commute. The countywide system map is shown in *Figure 5*.

In 2013 the Utah transit Authority (UTA) expanded its light rail offerings in Salt Lake County by adding the West Valley City, Mid-Jordan, Airport, and Draper lines. The addition of the West Valley City line was a capital investment of \$367,154,587. The airport line, which runs through the west side of Salt Lake City, had an approximate cost of \$318,899,433. The West Valley City to the airport is known as the Green Line and had provided much improved public transit services to area of high concentrations of minority and low-income residents in both West Valley City and the west side of Salt Lake City. For many protected classes the green line provides easy access to downtown, major employment centers including the Airport, hospitals, downtown Salt Lake City, and the University, as well as more transit options heading north-south and east-west though the county. The near \$700 million investment by UTA in this line represents the most beneficial physical infrastructure investment for protected classes.

The expanded Mid-Jordan line, which runs into the community of Daybreak in the southwest quadrant of the county, had an estimated cost at completion of \$521,170,520 and the extension of Draper line's cost at completion was \$156,912,726. While the cities of Draper and South Jordan have relatively low numbers of low-income, minority, and other protected class residents. The new TRAX lines may be an incentive for some protected class members to move to the southwest and southeast parts of the county. The bottleneck that will likely reduce the use of these lines by protected classes is affordable housing.

The TRAX light rail provides public transportation options throughout Salt Lake County. Taking a TRAX train can be much faster than public busses as they travel at higher speeds, have a higher rider capacity, and have fewer stops. However, TRAX has fixed routes based on track lines that serve mostly northern and central portions of the county along Interstate 15. As a result, not all residents in the county have easy access to TRAX stations. *Figure 7* shows the area within a half mile and mile buffer via the road network.

Figure 6
 UTA Rail System Map, 2013



Overall, only 99,478 residents live with a half mile of a TRAX station, only 30,992 of which are minority residents *Table 2*. While about 9.5 percent of the total population of Salt Lake County lives within a half-mile of a TRAX station, just over 11 percent of the counties minority population lives within a half of mile of TRAX station. Of the occupied housing units within a half-mile of a TRAX stations, 59.2 percent are renter-occupied. Renters account for about half of the total population living within a half mile of a TRAX station in Salt Lake County. However, only just over 4 percent of all renter-occupied housing units in Salt Lake County are within a half-mile of a station. Minority and renters have benefited at a slightly higher level than the general public from the development of TRAX.

Figure 7
TRAX Station Buffer Zones, 2014

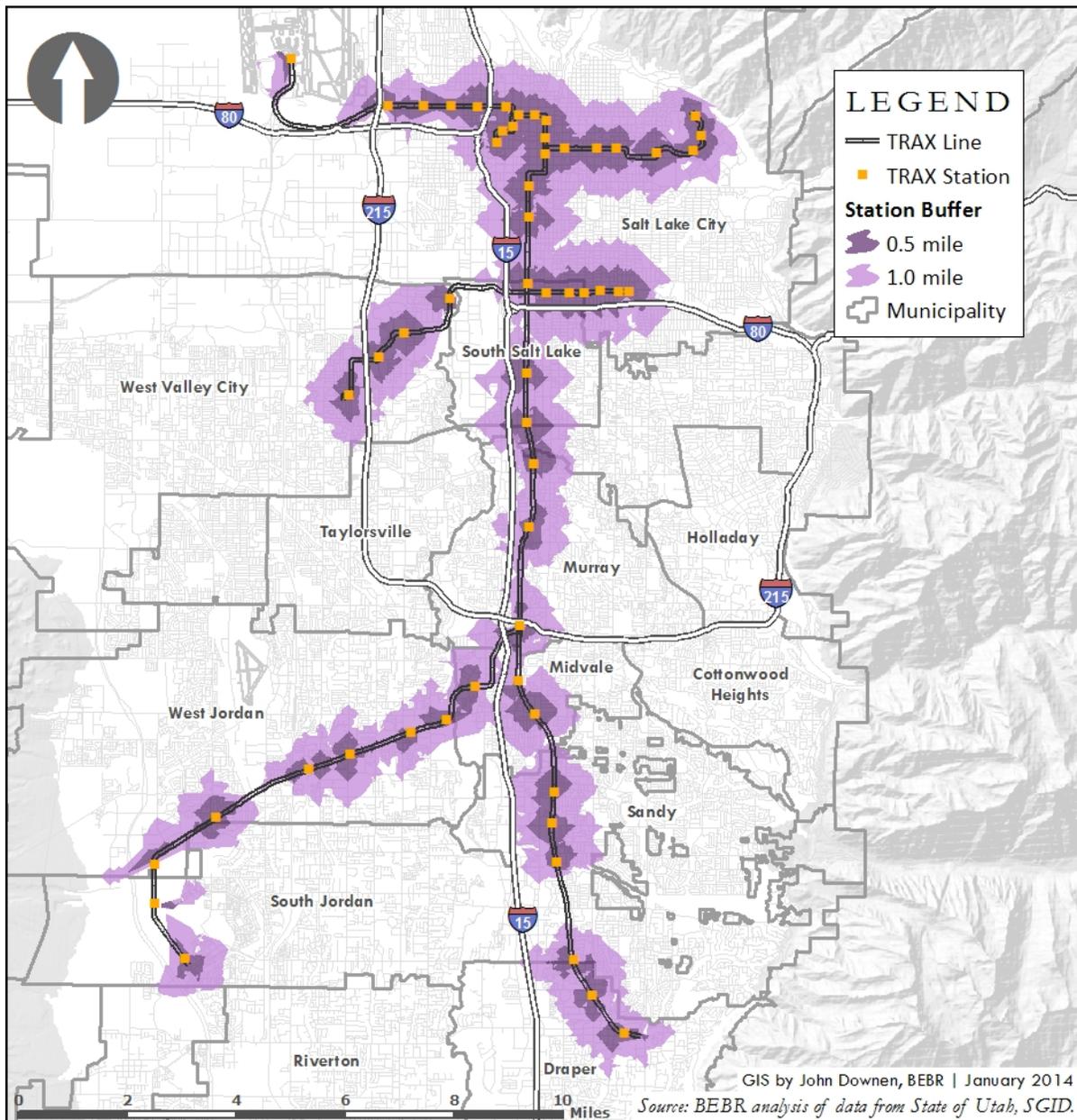


Table 2
Characteristics of TRAX Station Neighborhoods: 0.5-Mile Buffer

Station Name	Population		Housing Units		Renter Population	Homes ≤ \$200,000
	Total	Minority	Occupied	Renter-Occupied		
1940 W North Temple	1,944	1,358	662	518	1,327	3
2700 W Sugar Factory Rd	4,043	847	1,330	503	1,253	176
300 East	4,883	1,936	2,134	1,240	2,714	740
4773 W Old Bingham Hwy	4,492	744	1,121	125	516	40
500 East	4,967	1,743	2,086	1,085	2,657	740
5651 W Old Bingham Hwy	5	3	1	1	5	0
700 East	4,184	1,219	1,716	846	2,192	556
900 East	8,701	2,182	4,462	3,445	6,450	271
900 East	4,237	978	1,973	1,191	2,380	235
900 South	1,992	856	1,001	825	1,494	164
Airport	0	0	0	0	0	0
Arena	3,752	1,147	1,729	1,516	2,198	1
Ballpark	2,333	1,262	943	749	1,805	104
Bingham Junction	634	208	314	313	632	0
Central Pointe	1,596	500	888	644	1,021	111
City Center	4,802	944	3,104	2,549	3,728	0
Courthouse	2,496	544	1,677	1,237	1,675	0
Crescent View	3,817	594	1,124	127	385	11
Daybreak Parkway	1,037	179	306	53	203	53
Decker Lake	3,418	1,926	1,077	579	1,983	118
Draper Town Center	847	69	270	82	246	10
Fairpark	1,341	721	514	193	488	59
Fashion Place West	1,774	254	656	146	402	125
Fort Douglas	1,614	438	108	108	429	0
Gallivan Plaza	3,554	1,096	1,843	1,420	1,944	0
Historic Gardner	1,001	398	357	247	660	9
Historic Sandy	3,776	1,265	1,307	706	1,947	278
Jackson/Euclid	3,775	2,127	1,425	977	2,315	342
Jordan Valley	3,582	951	1,023	143	573	243
Kimballs Lane	2,238	242	729	176	408	95
Library	4,280	1,207	2,762	2,257	3,273	22
Main St	2,448	905	1,143	754	1,370	229
McClelland St	4,263	949	2,178	1,374	2,519	129
Meadowbrook	939	424	324	191	607	20
Midvale Center	4,216	1,098	1,679	851	1,991	537
Midvale Fort Union	1,785	494	757	441	1,026	183
Millcreek	716	249	355	257	466	86
Murray Central	1,085	241	515	345	647	26
Murray North	1,273	402	611	420	875	14
North Temple Bridge/Guadalupe	2,683	1,105	1,299	1,046	1,918	55
Old Greektown	3,817	1,368	1,746	1,554	2,314	9
Planetarium	3,621	1,269	1,610	1,435	2,144	0
Power Station	1,534	999	548	252	850	5
Redwood Junction	2,648	1,635	798	492	1,745	184
River Trail	999	511	286	121	464	49
Salt Lake Central	2,887	1,076	1,143	994	1,557	1
Sandy Civic Center	1,630	310	522	88	289	191
Sandy Expo	2,066	477	629	208	629	224
South Jordan Parkway	7	1	3	0	0	0
Stadium	4,508	861	2,332	1,823	3,273	129
Temple Square	4,366	805	2,705	2,091	3,194	8
Trolley	7,387	2,162	4,023	3,240	5,657	167
University Medical Center	2,433	756	463	390	1,010	0
University South Campus	1,493	420	109	109	432	0
West Jordan City Center	2,158	818	677	209	592	69
West Valley Central	4,425	2,199	1,400	717	2,348	335
Total	99,478	30,992	40,302	23,850	50,357	5,809

Note: The total is less than the sum of the stations because many stations' "neighborhoods" overlap.

Source: BEBR analysis of data from U.S. Census Bureau, 2010 Census and Salt Lake County Assessor.

There are 246,935, or 24 percent of Salt Lake County's population, living within a one mile buffer of all the TRAX stops in Salt Lake County *Table 3*. Of these residents 79,145 are minorities, almost 30 percent of Salt Lake County's minority population lives within one mile walking distance of a TRAX station. Of the residents living within a mile of a station 46.5 percent are renters. In this same area, there are 93,053 occupied housing units, 52.6 percent of which are rental units. Similarly, approximately 44 percent of all renter-occupied units in the county are located within a mile walking distance of a TRAX station. While there were only 5,809 homes valued less than \$200,000 with a half mile of all TRAX stops, there are 21,453 within a mile of a TRAX stop.

At the one mile buffer it is clear that TRAX provides access to public transportation to a significant share of minorities and renters.

Figure 8 shows the half-mile and mile buffer zones of the five FrontRunner stations in Salt Lake County. The FrontRunner South line is a high speed commuter train that runs from Salt Lake Central south into Utah County. This line cost an estimated \$934,477,168. It is the first major public transit investment connecting the metropolitan areas of Salt Lake City and Orem-Provo together. The North Temple Bridge/Guadalupe and Salt Lake Central station have overlapping buffer zones. In this case, the homes located in this area are located within a half-mile or mile of both stations. In *Table 3* and *Table 4* the total count represents a unique individual count while each station will count all residents and homes within the selected buffer, thereby resulting in the double counting of some individuals and homes at the station designation.

Table 4 and *Table 5* show selected characteristics of the population of Salt Lake County that reside with a half-mile and mile, respectively, of the FrontRunner line. Overall, less than 1 percent of the county's population lives within a half-mile and 2.6 percent live within a mile of any FrontRunner station in the county. Similarly, 1 percent of all minority residents in the county live within a half-mile of a FrontRunner station, whereas 3.4 percent live within a mile. While 43.4 percent of the occupied housing units within 0.5-mile are rentals, 60.3 percent of the population living in this area rents. Similarly within a mile of FrontRunner Stations where 52.5 percent of housing units are renter-occupied and 52.4 percent of the population in this area is living in a rental unit. Of the five stations in Salt Lake County, only 130 homes are valued at less than or equal to \$200,000 within a half-mile and 2,030 homes within a mile. Less than 2 percent of the 110,482 homes valued at \$200,000 or less in 2011 are within a mile of a FrontRunner station.

Clearly, and not unexpectedly, TRAX has much greater benefit to minority, ethnic, disabled, and large family populations.

Table 3
Characteristics of TRAX Station Neighborhoods: 1-Mile Buffer

Station Name	Population		Housing Units		Renter Population	Homes ≤ \$200,000
	Total	Minority	Occupied	Renter-Occupied		
1940 W North Temple	5,509	3,858	1,733	993	3,102	206
2700 W Sugar Factory Rd	8,933	1,887	2,758	637	1,726	886
300 East	14,808	5,094	6,380	3,442	7,866	2,757
4773 W Old Bingham Hwy	10,570	1,892	2,704	429	1,600	200
500 East	16,247	4,897	7,048	3,685	8,333	2,748
5651 W Old Bingham Hwy	806	147	197	14	70	0
700 East	16,275	4,344	7,355	3,913	8,288	2,359
900 East	15,428	3,535	6,727	3,387	7,341	1,640
900 East	21,565	4,969	11,263	8,272	14,717	1,062
900 South	8,815	4,084	3,713	2,859	5,664	718
Airport	0	0	0	0	0	0
Arena	12,732	3,667	6,638	5,069	8,460	346
Ballpark	9,152	4,117	3,843	2,447	5,498	1,161
Bingham Junction	4,303	2,251	1,534	959	2,817	166
Central Pointe	6,546	2,701	2,896	1,867	3,924	944
City Center	14,744	3,453	8,429	6,771	10,155	104
Courthouse	11,814	3,894	6,521	5,466	8,547	298
Crescent View	11,254	1,664	3,701	1,126	2,385	405
Daybreak Parkway	4,877	669	1,345	278	1,061	224
Decker Lake	11,852	6,466	3,879	1,947	6,212	1,120
Draper Town Center	5,809	500	1,706	239	737	100
Fairpark	8,754	5,324	2,964	1,560	4,449	1,022
Fashion Place West	7,039	1,505	2,676	1,016	2,664	729
Fort Douglas	5,537	1,691	1,565	1,306	3,498	0
Gallivan Plaza	13,621	3,419	7,919	6,479	9,574	41
Historic Gardner	7,952	3,567	2,522	1,132	3,531	351
Historic Sandy	9,912	2,919	3,396	1,407	4,206	1,077
Jackson/Euclid	11,400	6,579	4,177	2,637	6,482	1,429
Jordan Valley	9,170	2,353	2,691	606	2,045	870
Kimballs Lane	9,385	1,194	2,913	580	1,599	415
Library	16,998	5,013	9,330	7,505	12,113	519
Main St	10,850	4,598	4,572	2,734	6,301	1,751
McClelland St	14,515	3,046	6,345	3,073	6,670	1,052
Meadowbrook	9,376	4,086	3,849	2,873	7,061	409
Midvale Center	14,018	4,720	5,137	2,444	6,948	1,723
Midvale Fort Union	4,140	1,103	1,571	694	1,783	658
Millcreek	7,827	3,767	2,221	1,553	4,117	272
Murray Central	7,174	1,560	2,872	1,600	3,881	686
Murray North	6,268	2,154	2,525	1,728	4,430	224
North Temple Bridge/Guadalupe	12,847	4,626	5,878	4,516	8,179	778
Old Greektown	7,991	3,460	3,394	2,524	4,513	476
Planetarium	9,147	3,207	4,379	3,585	6,086	224
Power Station	6,854	4,756	2,092	1,141	3,581	385
Redwood Junction	7,840	4,368	2,567	1,279	4,289	654
River Trail	2,309	1,209	698	307	1,119	429
Salt Lake Central	8,550	4,241	3,395	2,308	4,482	633
Sandy Civic Center	5,191	758	1,758	309	1,036	734
Sandy Expo	8,487	1,904	2,930	1,022	2,910	1,116
South Jordan Parkway	7	1	3	0	0	0
Stadium	12,383	2,389	5,886	3,939	7,474	448
Temple Square	15,431	3,806	8,490	6,642	10,506	209
Trolley	21,449	5,807	11,490	8,978	15,662	965
University Medical Center	3,683	843	878	420	1,096	0
University South Campus	7,629	2,136	2,722	2,410	5,535	76
West Jordan City Center	7,541	2,318	2,298	600	1,902	348
West Valley Central	17,298	8,799	5,643	2,814	8,383	2,036
Total	246,935	79,145	93,053	48,921	114,714	21,453

Note: The total is less than the sum of the stations because many stations' "neighborhoods" overlap.

Source: BEBR analysis of data from U.S. Census Bureau, 2010 Census and Salt Lake County Assessor.

Figure 8
FrontRunner Station Buffer Zones in Salt Lake County, 2014

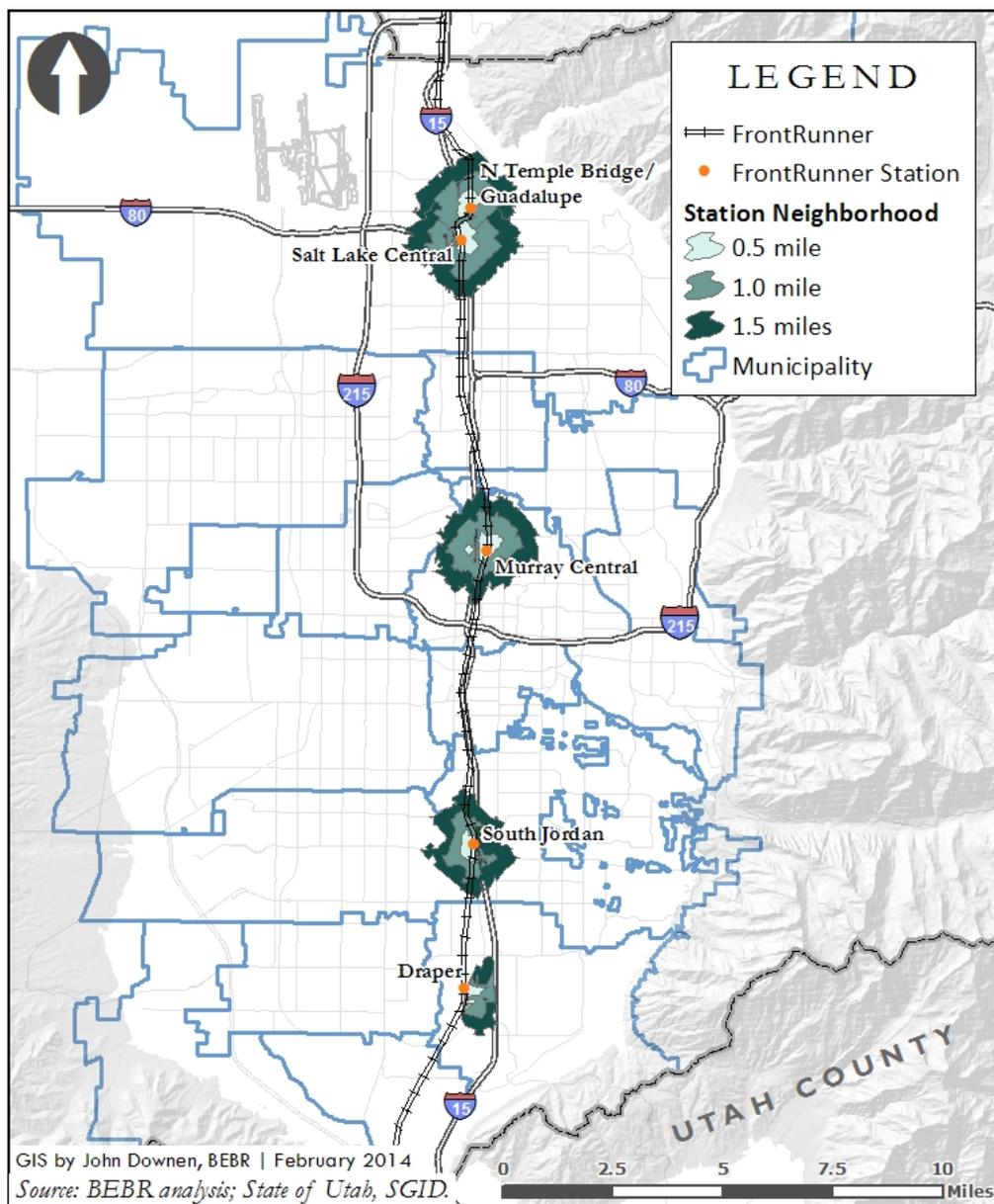


Table 4
Characteristics of FrontRunner Station Neighborhoods: 0.5-Mile Buffer

Station Name	Population		Housing Units		Renter Population	Homes ≤ \$200,000
	Total	Minority	Occupied	Renter-Occupied		
No. Temple Bridge/Guadalupe	2,138	1,079	976	746	1,544	106
Salt Lake Central	2,887	1,076	1,143	994	1,557	0
Murray Central	1,549	379	725	557	1,122	10
South Jordan	953	204	413	356	770	0
Draper	1,373	210	468	276	607	14
Salt Lake County Total*	8,304	2,681	3,397	2,602	5,006	130

* Total is less than the sum of the stations because the No. Temple Bridge and Salt Lake Central stations' neighborhoods overlap.
 Source: BEBR analysis of U.S. Census Bureau, 2010 Census data and Salt Lake County Assessor data.

Table 5
Characteristics of FrontRunner Station Neighborhoods: 1-Mile Buffer

Station Name	Population		Housing Units		Renter Population	Homes ≤ \$200,000
	Total	Minority	Occupied	Renter-Occupied		
No. Temple Bridge/Guadalupe	8,889	3,576	4,007	2,776	5,566	881
Salt Lake Central	8,550	4,241	3,395	2,308	4,482	628
Murray Central	8,260	1,852	3,166	1,646	4,104	554
South Jordan	2,616	454	1,038	624	1,376	10
Draper	1,384	210	471	279	618	41
Salt Lake County Total*	27,227	9,158	10,850	6,664	14,278	2,030

* Total is less than the sum of the stations because the No. Temple Bridge and Salt Lake Central stations' neighborhoods overlap.
Source: BEBR analysis of U.S. Census Bureau, 2010 Census data and Salt Lake County Assessor data.

Table 6 shows the characteristics of Salt Lake County residents living within a mile and a half of a FrontRunner station. The extra half-mile more than doubles the total population living in the area from one mile, and increases the minority population by approximately 142 percent. This accounts for just over 8 percent of the total minority population in the county. Both the number of renter-occupied units and the rental population more than doubled in this added area as well.

Table 6
Characteristics of FrontRunner Station Neighborhoods: 1.5-Mile Buffer

Station Name	Population		Housing Units		Renter Population	Homes ≤ \$200,000
	Total	Minority	Occupied	Renter-Occupied		
No. Temple Bridge/Guadalupe	21,635	8,993	9,367	6,479	12,981	1,843
Salt Lake Central	20,471	10,902	7,856	5,077	10,914	2,293
Murray Central	18,785	4,631	7,169	3,238	8,456	1,395
South Jordan	6,996	1,182	2,691	1,268	2,870	211
Draper	3,917	957	1,008	620	1,389	41
Salt Lake County Total*	62,098	22,029	24,306	13,824	30,999	4,982

* Total is less than the sum of the stations because the No. Temple Bridge and Salt Lake Central stations' neighborhoods overlap.
Source: BEBR analysis of U.S. Census Bureau, 2010 Census data and Salt Lake County Assessor data.

Figure 9 depicts the existing bike routes in Salt Lake County. These routes include paved and non-paved pathways, bike lanes, and designated bike routes. The densest concentration of bike routes is in Salt Lake City, specifically central and eastern Salt Lake City. There is a notable lack of bike routes in the central portion of the county from South Salt Lake south to Midvale and west in Magna, West Valley City, Kearns, Taylorsville, and West Jordan. The main exception to this is the Jordan River Parkway trail which runs almost the entire length of the county from Draper to Salt Lake City. This trail much like the others in southern and western parts of the county are more likely used for recreation rather than reliable commuting to and from work, shops, and services. These kinds of routes therefore provide more of a benefit to those that have the time, energy, and resources to bike for pleasure. Such riders are unlikely to be members of the protected classes. The routes in Salt Lake City however do provide more of a commuter aspect than recreation as more residents living in this area can and do use these paths for daily commutes as opposed to recreation. However, based on the distribution of the protected classes on the west side and outside of the city, it is also unlikely they are able to utilize these bike routes effectively.

Figure 9
Existing Bike Routes Salt Lake County 2014

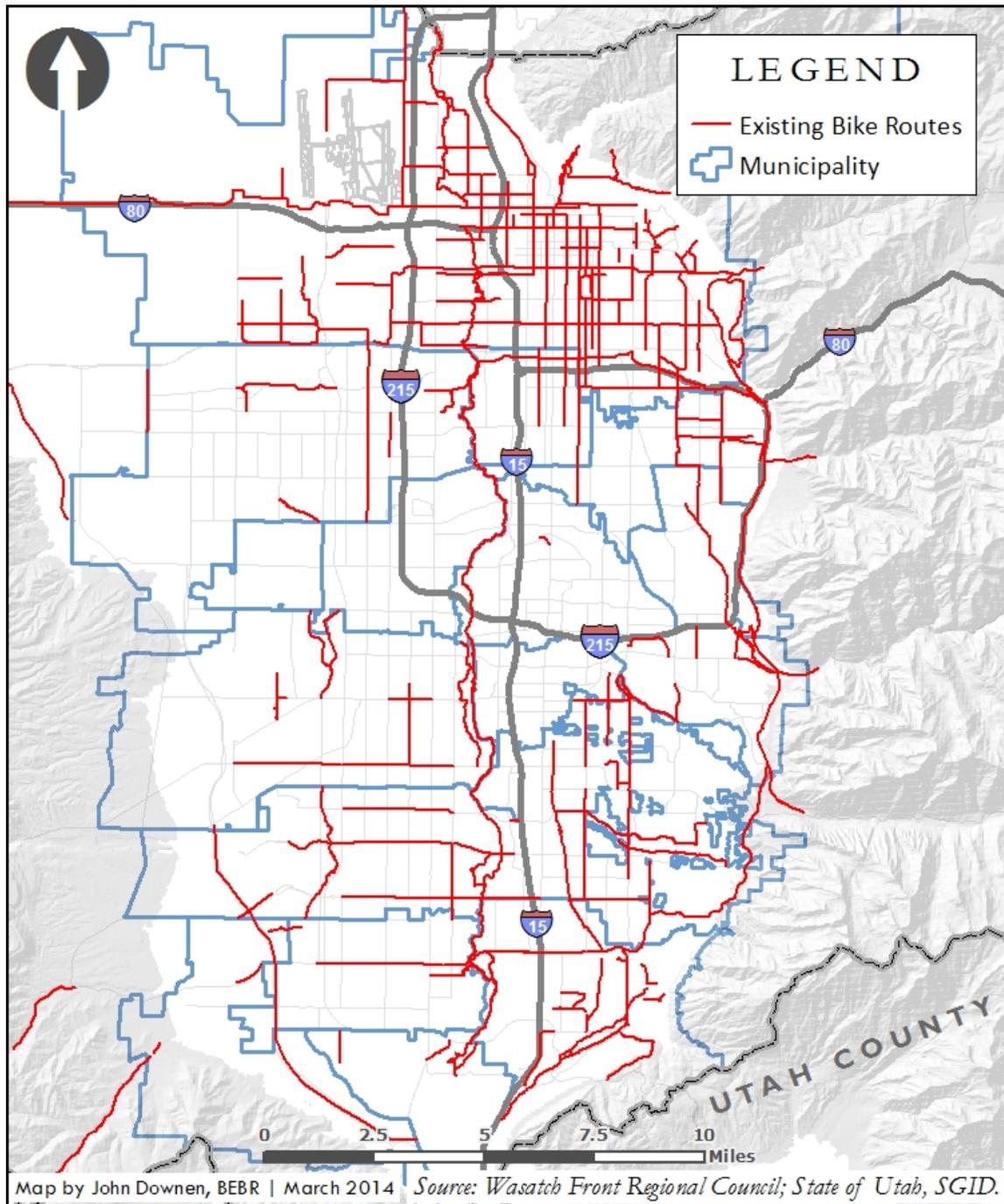
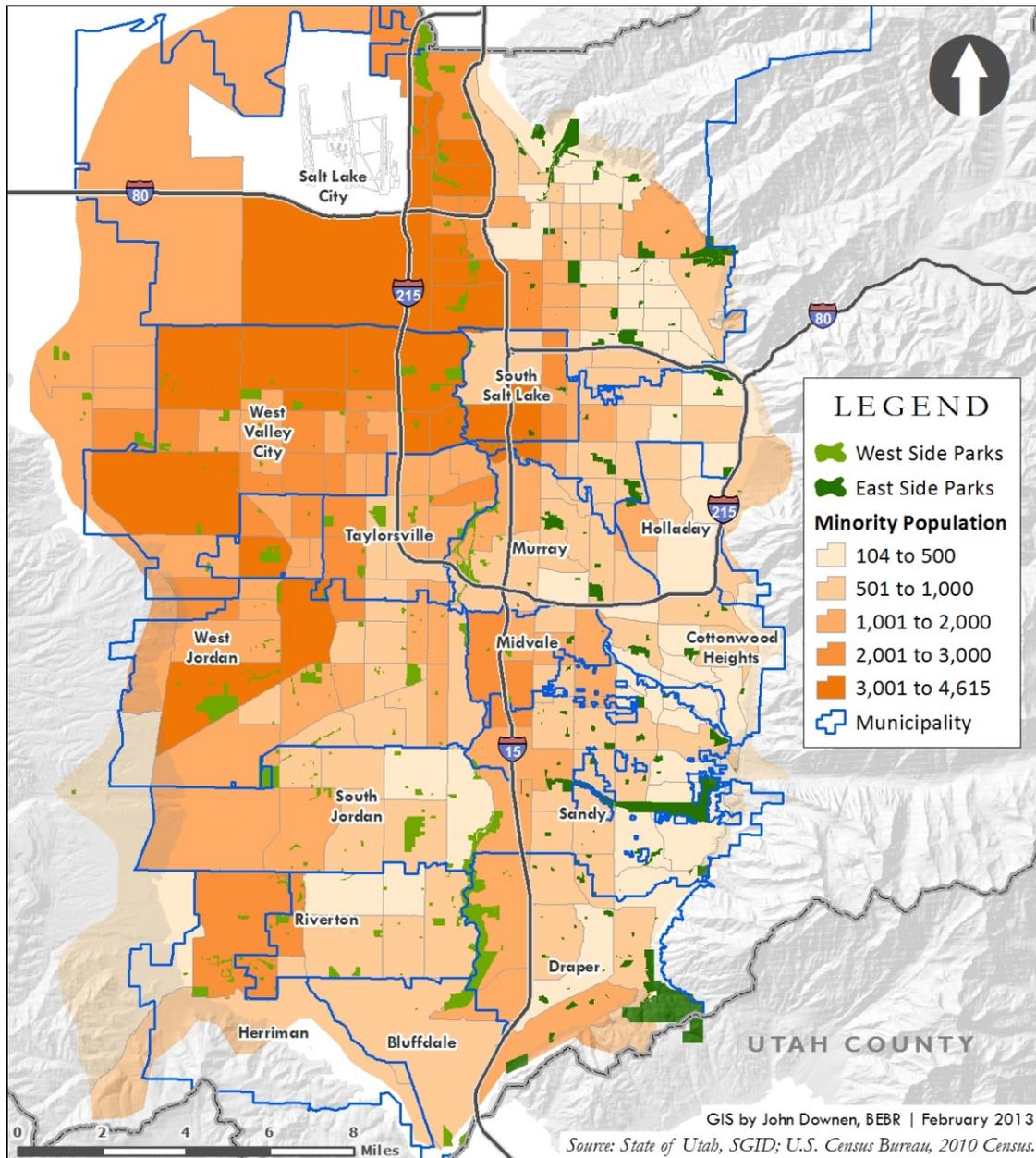


Figure 10 shows the public parks in Salt Lake County. Also shown in Figure 10 is the minority population by Census Tract, with the darker tracts having higher numbers of minority residents. Public parks appear to be reasonably distributed throughout the county, benefitting both minority and non-minority populations.

Figure 10
Public Parks and Minority Population in Salt Lake County, 2010



Hospitals and major clinics provide not only essential health care services but, also job opportunities to low-income households. Hospitals however, are very unevenly distributed throughout Salt Lake County. Of the twenty hospitals in the county with 3,200 beds, nine are located in the extreme northeast corner of the county. These nine hospitals have 1,600 beds *Figure 11*. There is a notable lack of hospitals on the west side of the county, with only four hospitals located west of Interstate 15. Only one of these hospitals is located in the northwest corner of the county in central West Valley City near the tracts high minority populations. However, one of the county’s largest hospitals is centrally located in the county on the west side of Murray near the Taylorsville border and it is likely many of the residents in this area will use this Intermountain Health Care facility.

The two largest hospitals in Salt Lake County; Intermountain Medical Center and the University of Utah Medical Center are both located on the TRAX line. These important employment centers and health care providers are less accessible by TRAX for low-income households in Taylorsville, parts of West Valley City and unincorporated Salt Lake County. There is a Bus Rapid Transit system running 10.8 miles down 3500 south from Magna to the 2700 West TRAX station, which is an important transportation network for some of West Valley City residents. But for those many low-income households living between 4500 South and 6200 South—UTA’s Taylorsville Murray study area—improved access to public transportation; e.g. more frequent bus schedules should be a high UTA priority.

Figure 11
Hospitals in Salt Lake County

