

ANALYSIS OF IMPEDIMENTS to FAIR HOUSING CHOICE

City of Ogden

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PREPARED BY OGDEN CITY COMMUNITY AND ECONOMIC DEVELOPMENT DEPARTMENT AND

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Introduction

An Analysis of Impediments to Fair Housing Choice (AI) is a comprehensive review of municipal housing, economic, and transportation conditions, as well as public and private sector policies in order to ensure that housing choices and opportunities for all persons in a community are available. Under the HOME and Community Development Block Grant (CDBG) statutes, the AI is a document required by HUD as part of the Five Year Consolidated Plan 2016-2020 (ConPlan). The city must certify to HUD that an AI was conducted and fair housing action steps are being implemented. Goals and objectives are designed to identify and mitigate obstacles to fair housing choice. Many of these are also included in the five year ConPlan.

Since the last Analysis of Impediments to Fair Housing Choice was completed in 2010, Ogden City has actively worked to meet the objectives outlined in the Action Plan and to find ways to mitigate or remove barriers to fair housing. Ogden City has worked with the Utah Fair Housing Forum, Ogden Housing Authority and the Disability Law Center to develop a cooperative approach to develop fair housing choices through the region.

Analysis of Impediments to Fair Housing Choice Process

Developed to accompany the City of Ogden's ConPlan 2016-2020, this AI has been completed to meet requirements of the Housing and Community Development Act and HUD regulations governing the preparation of the ConPlan. To assist in the development of Ogden's AI, University of Utah's Bureau of Economic and Business Research David Eccles School of Business, James Wood, John Downen, DJ Benway and Darius Li (BEBR) were contracted to prepare a Regional Analysis of Impediments to Fair Housing Choice for Weber County – referred to as "Regional AI", dated May 2014. The Regional AI provides the framework for Ogden's Analysis of Impediments to Fair Housing Choice 2015. In addition to the Regional AI, the City utilized the Weber County Housing Assessment & Plan 2012-2014 (Weber County Housing Plan) which provided supportive data, tables, maps, research and analysis to determining housing needs in Ogden.

The Regional AI and Weber County Housing Plan process included: 1) gathering essential economic and housing data, employing mapping and analysis tools; 2) soliciting and ensuring meaningful community input from key stakeholders; 3) creating and prioritizing inter-jurisdictional objectives, goals and outcomes with planning professionals upon which a collective vision for regional growth could be shaped and adopted by the public, while supporting individual cities in maintaining their unique identities; 4) seeking out community-based organizational partners, and financial resources critical to its eventual implementation; and finally 5) outlining a structure to assist in carrying the process forward.

Impediments to fair housing choice are:

- Any actions, omissions, or decisions taken *because of* one's membership in a protected class which restrict housing choices or the availability of housing choices; and
- Any actions, omissions, or decisions which *have the effect of* restricting housing choices or the availability of housing choices on the basis of one's membership in a protected class.

This report considers impediments to fair housing choice experienced by both the federal protected classes.

Protected Classes

The federally protected classes are:

- Disability
- Familial status
- National origin
- Race
- Color
- Religion
- Sex

I. Demographic Trends and Characteristics

Ogden's Population 82,825 (U.S. Census, 2010)

Ogden's population shows a modest increase over the past ten years. In 2010 the population of the city was estimated at 82,825 by the U.S. Census Bureau, an increase of 7.3 percent since 2000 Table 1. Over the past twenty years the population of Ogden City increased by 22 percent, driven by higher rates of population increase in the 1990s. Ogden is the largest city in Weber County and accounts for about 36 percent of the population of the county. The population growth of Ogden is lower than the 17.7 percent growth rate for the county. Ogden is a mature, older city with little opportunity for new large scale residential development on sizeable parcels of undeveloped land.

Minority Population

1 in 3 persons is a minority in Ogden. (U.S. Census, 2010)

The minority population of Ogden has increased at a much faster pace than the overall population. In 2000 the minority population in the city totaled 16,395 individuals. By 2010 the number of minority individuals in the city had increased by 84.6 percent to 30,268. In 2010 one in three individuals in Ogden City is a minority up from one in five in 2000. The city has by far the largest concentration of minority individuals of any study city. 36.5% of Ogden's Population is a minority, compared to 21.9% in Weber County and 19.6% in Utah.

36.5% minority populations in Ogden, compared to 21.9% Weber County and 19.6% in Utah (2010)

The AI has a broader analytical scope that encompasses issues associated the 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. The Table below shows the number of individuals in protected classes in Weber County and in Ogden City. For example, the minority population (including Hispanics) represents nearly 22 percent of the population of the county. In Ogden 36 percent of the population is minority and 30 percent is Hispanic.

Percent Share of Population by Race and Ethnicity, 2010

| | Total Population | White | Minority | Hispanic | African American | Pacific Islander | Asian | Native American | Other |
|--------------|------------------|-------|----------|----------|------------------|------------------|-------|-----------------|-------|
| Weber County | 100.0 | 78.1 | 21.9 | 16.7 | 1.2 | 0.3 | 1.2 | 0.5 | 1.9 |
| Ogden | 100.0 | 67.1 | 36.5 | 30.1 | 1.9 | 0.3 | 1.2 | 0.8 | 2.3 |

Source: U.S. Census Bureau.

Percent Share of Disabled Individuals and Selected Households, 2010

| | Total Population | Disabled Individuals | Large Family Households | Single Parent with Child Under 18 yrs Households. | Households with Persons over 65 |
|--------------|------------------|----------------------|-------------------------|---|---------------------------------|
| Weber County | 100.0% | 10.1 | 17.3 | 11.2 | 21.1 |
| Ogden | 100.0% | 11.7 | 14.8 | 14.0 | 19.6 |

Source: U.S. Census Bureau.

Other demographic characteristics of Ogden include:

The population of Ogden is getting older. The median age has increased from 28.6 years to 29.6 years. The increase in the median age reflects the modest growth of the city. In 2010 about 31 percent of the population of Ogden was 19 years or younger, about the same percent as the county's 32.9 percent and the state's 34.8 percent.

Table 1
Ogden: Demographic Characteristics

| | 2000 | 2010 | Chg. | Weber County | State of Utah |
|------------------------------|--------|--------|--------|--------------|---------------|
| Population | 77,226 | 82,825 | 7.3% | 17.7% | 23.8% |
| Median Age | 28.6 | 29.6 | 3.5% | 30.7 | 29.2 |
| 65 years and older | 8,871 | 7,790 | -12.2% | --- | --- |
| Percent 65 years and older | 11.5% | 9.4% | | 10.1% | 9.0% |
| 19 years and younger | 25,057 | 26,108 | 4.2% | --- | --- |
| Percent 19 years and younger | 32.4% | 31.5% | | 32.9% | 34.8% |
| Households | 27,384 | 29,631 | 8.2% | 19.9% | 25.2% |
| Average Household Size | 2.73 | 2.73 | 0.0% | 2.9 | 3.1 |
| Minority Population* | 16,395 | 30,268 | 84.6% | --- | --- |
| Percent Minority Population | 21.2% | 36.5% | | 21.9% | 19.6% |

*Minority population includes those of the following races: black, American Indian, Asian, Native Hawaiian and other Pacific Islanders and other race. Hispanic is an ethnicity denoted by origins or identification with Spanish or Portuguese speaking countries. Hispanics are included in minority count.

Source: U.S. Census Bureau, 2000 SF1 and 2010 SF1.

29,631 households in Ogden a 8.2% increase in ten years (U.S. Census, 2010)

The number of households in the city in 2010 totaled 29,631, an increase of 8.2 percent in ten years. The average size of households remains very stable at 2.73 persons per households. The small size of the average household is partly a reflection of the student renters attending Weber State University. Other than Washington Terrace, Ogden has the smallest size households among the study cities.

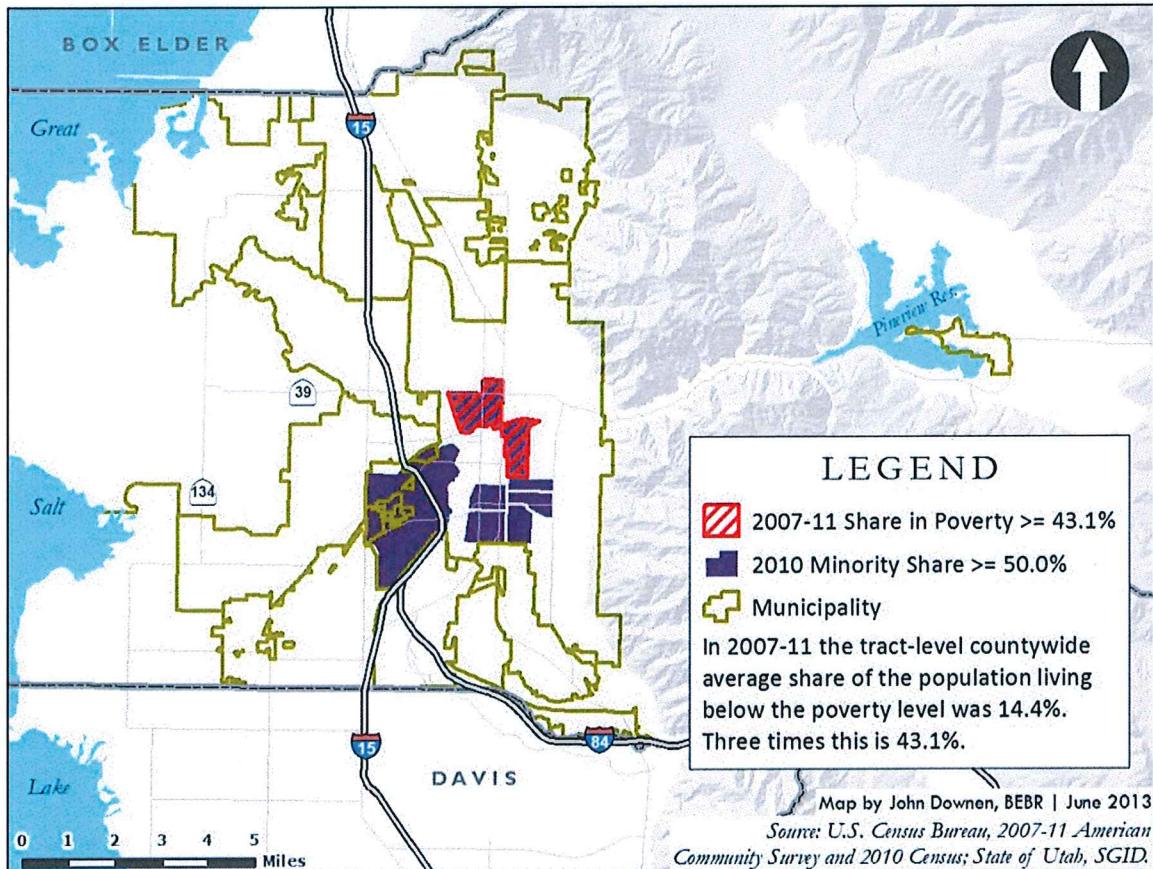
Racially and Ethnically Concentrated Areas of Poverty (RCAP/ECAP)

RCAP/ECAP has 50% or more minority population and three times the poverty rate of the county.

In Weber County, there are four racially and ethnically concentrated areas of poverty (RCAP/ECAP), all of which are in the southern half of the county. HUD defines a racially/ethnically concentrated area of poverty as (1) a census tract where the number of individuals in poverty is equal to or greater than 40

percent of the tract's population, or an overall poverty rate equal to or greater than three times the metropolitan poverty rate and (2) a non-white population, measured at greater than 50 percent of the population (minority-majority).

Figure 2- RCAPs in Weber County



Poverty Rate Three Times County Average

All Weber County racially and ethnically concentrated areas of poverty (RCAP) are in Ogden.

The identification of RCAPs uses a measure of three times the poverty rate of the county. Any tract with three times the poverty rate of the county is a concentration of poverty. *Figure 3* overlays these areas of high poverty with census tracts that have a minority-majority population. All of the tracts satisfying these two conditions are located within the city of Ogden.

The countywide poverty rate is 14.4 percent, so an area is considered highly concentrated when it has 43.1 percent or more of the population living in poverty. In, all cases, the RCAP and ECAP tracts are communities of low-valued homes and with a high proportion of minority renters and homeowners. These areas of high concentrations of minority residents also tend to be in areas of only low- to mid-level access to opportunity. With more affordable housing options in the county, these concentrations of poverty and minority residents would be less severe and more evenly distributed in Weber County.

Renters in RCAP and ECAP Census Tracts

RCAPs and ECAPs in Ogden are characterized by high rates of renter-occupied housing

Weber County's RCAPs and ECAPs are characterized by 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 2009 there were 1,712 occupied housing units and over 83 percent were renter-occupied units (Table 4, Page 41). Furthermore, in RCAP and ECAP census tracts, the rate at which occupied housing units are rented and not-owned never falls below 47.3 percent.

II. Employment Trends and Characteristics

Ogden is the employment center for Weber County with employment of 56,769 in 2009

Ogden is the employment center for Weber County. Ogden had a nonfarm employment of 56,769 in 2009 Table 2. Two-thirds of all jobs in Weber County are located in Ogden City. Ogden is the county seat as well as the largest city and the location of major federal government (IRS) and state government employment (Weber State University). Consequently the government sector is by far the largest and most important employment sector with 28 percent of all workers, a total of 15,700 jobs. The average government wage is nearly \$40,000, about \$2,500 above the average wage in the city. Hill Air Force Base (HAFB), located on the Davis and Weber County border is also a source of relatively high paying government jobs for Ogden residents. HAFB employs about 24,000 Utahns.

The Ogden City labor market has a relatively high share of manufacturing employment. Seventeen percent of all jobs are in manufacturing. Countywide manufacturing represents 13 percent of all jobs and at the state level manufacturing accounts for only 10 percent of total jobs. Manufacturing is the highest wage sector with an average wage of \$48,080.

\$37,500 average wage in Ogden. (2009)

Table 2
Employment Characteristics in Ogden City - 2009

| | Number of Firms | Employment | Share of Employment | Average Wage |
|-----------------------------------|-----------------|------------|---------------------|--------------|
| Mining | 0 | 0 | 0.0% | \$0 |
| Construction | 307 | 2,433 | 4.3% | \$41,959 |
| Manufacturing | 172 | 9,810 | 17.3% | \$48,080 |
| Trade, Trans & Utils | 609 | 8,114 | 14.3% | \$31,516 |
| Information | 26 | 765 | 1.3% | \$26,210 |
| Financial Activities | 299 | 2,104 | 3.7% | \$38,748 |
| Professional & Business Services | 435 | 5,715 | 10.1% | \$33,516 |
| Health Services and Private Educ. | 288 | 6,868 | 12.1% | \$40,721 |
| Leisure & Hospitality | 222 | 3,786 | 6.7% | \$13,188 |
| Other Services | 189 | 1,460 | 2.6% | \$28,111 |
| Government | 118 | 15,714 | 27.7% | \$39,818 |
| Total | 2,666 | 56,769 | 100.0% | \$37,325 |

D = nondisclosure.

Source: Utah Department of Workforce Services.

The third ranking sector is trade, transportation and utilities. Well over 80 percent of the jobs in this sector are in retail trade. Retail trade employs about 6,500 workers in Ogden City. Health care ranks fourth in share of employment in Ogden City. IHC's McKay Dee Hospital is the largest health care employer.

III. Housing Market Characteristics, Trends and Affordability

Ogden City has a very high share of rental units. Statewide about 30 percent of the occupied housing inventory is rental units, well below the share in Ogden City.

In 2010 the inventory of residential units in Ogden was 32,482 units Table 3. Ninety-one percent of these units were occupied. Owner occupied units accounted for 58 percent of all occupied units while renter occupied units represented 42 percent of the housing inventory. Ogden City has a very high share of rental units. Statewide about 30 percent of the occupied housing inventory is rental units, well below the share in Ogden City. Renters are primarily non-Senior households. Nearly eighty percent of all renters are younger than 55 years. Twenty-one percent of renters are over 55 years old, whereas 42 percent of all homeowners are 55 years or older.

91% of all Ogden housing units are occupied; 58% owner-occupied and 42 renter-occupied

Table 3
Ogden: Housing Inventory Profile - 2010

| | Units | % Share |
|-----------------|--------|---------|
| Total Units | 32,482 | 100.0% |
| Occupied | 29,631 | 91.2% |
| Vacant Units | 2,851 | 8.8% |
| Owner Occupied | 17,093 | 57.7% |
| With Mortgage | 13,013 | 76.1% |
| Without | | |
| Mortgage | 4,080 | 23.9% |
| Renter Occupied | 12,538 | 42.3% |

Source: U.S. Census Bureau, 2010.

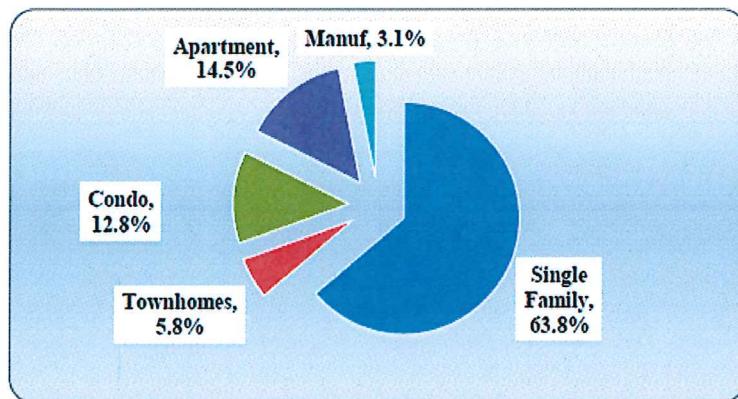
Table 29
Total Housing Units by City

| | 2000 | 2010 |
|--------------------|--------|--------|
| Weber County | 70,454 | 86,187 |
| Ogden | 29,763 | 32,482 |
| Roy | 11,053 | 12,599 |
| South Ogden | 5,459 | 6,631 |
| Unincorporated | 5,004 | 6,319 |
| North Ogden | 4,562 | 5,799 |
| Washington Terrace | 3,162 | 3,462 |
| West Haven | 1,220 | 3,324 |
| Pleasant View | 1,895 | 2,548 |
| Hooper | 1,777 | 2,156 |
| Plain City | 1,001 | 1,654 |

Source: U.S. Census Bureau.

Since 2000 Ogden has issued 1,636 permits for single-family homes, 373 permits for apartment units and 328 permits for condominiums Table 8 and Figures -1-2. New home construction has fallen from a high of 250 units in 2003 to 40 units in 2010, a decline of 85 percent.

Figure 2
Ogden: Percent Share of Residential Construction 2000-2010



Homeownership

Whites comprised 79 percent of all homeowners in Ogden. Hispanics own 17 percent of all owner occupied units, a relatively high share reflecting the diversity of the city. Very few other minority households own homes in Ogden Table 6. Sixty-five percent of the 12,500 renter households are whites. Hispanics account for 26 percent of renter households and blacks 3.1 percent Table 7.

Table 6
Ogden: Owner Occupied Units by Race and Ethnicity - 2010

| | Units | % Share |
|--|--------|---------|
| Owner-occupied housing units | 17,093 | 100.0% |
| White alone householder | 13,455 | 78.7% |
| Black or African American alone householder | 213 | 1.2% |
| American Indian and Alaska Native alone householder | 74 | 0.4% |
| Asian alone householder | 215 | 1.3% |
| Native Hawaiian and Other Pacific Islander alone householder | 26 | 0.2% |
| Some Other Race alone householder | 17 | 0.1% |
| Two or More Races householder | 168 | 1.0% |
| Hispanic or Latino | 2,925 | 17.1% |

Source: U.S. Census 2010.

79% of Ogden homeowners are White and 17% are Hispanic.

Table 7
Ogden: Renter Occupied Units by Race and Ethnicity - 2010

| | Units | % Share |
|--|--------------|--------------|
| Renter-occupied housing units | 12,538 | 100.0% |
| White alone householder | 8,208 | 65.5% |
| Black or African American alone householder | 389 | 3.1% |
| American Indian and Alaska Native alone householder | 173 | 1.4% |
| Asian alone householder | 137 | 1.1% |
| Native Hawaiian and Other Pacific Islander alone householder | 31 | 0.2% |
| Some Other Race alone householder | 22 | 0.2% |
| Two or More Races householder | 266 | 2.1% |
| Hispanic or Latino | 3,312 | 26.4% |

Source: U.S. Census 2010.

Housing Affordability

Ogden housing prices are 14% lower than the national average.

Ogden listed as one the ten most affordable housing markets in the nation by the CNNMoney website at www.money.cnn.com. While County-wide, incomes are not high as stated by this article, in comparison to national averages, Ogden's average incomes are not low but of a moderate level. Housing prices are also 14 percent lower than the national average. In the following assessment details it is clear that Ogden has a surplus of affordable housing options in place and the goal will be to focus on rehab and repair of existing properties as well as serving additional special needs populations.

“Ogden is the most affordable housing market of any city in the Wasatch Front.” BEBR

Deficit or Gap of Affordable Housing by Participating Cities

The following table lists the number of units needed in each city for three income categories, Extremely Low Income which is 30% and below of AMI, Very Low Income which is 30 to 50% of AMI and Low Income which is 50 to 80% of AMI.

| | Extremely Low Income | Very Low Income | Low Income |
|---------------------------|----------------------|-----------------|--------------|
| Roy | 566 | 865 | 1,282 |
| Plain City | 88 | 163 | 249 |
| Hooper | 98 | 186 | 294 |
| Washington Terrace | 141 | -27 | 65 |
| West Haven | 117 | 174 | 174 |
| North Ogden | 329 | 478 | 782 |
| Ogden | 177 | -2,313 | -1,861 |
| South Ogden | 320 | 317 | 479 |
| Pleasant View | 141 | 181 | 255 |
| Unincorporated | 145 | 265 | 344 |
| Total | 2,123 | 288 | 2,031 |

Source: HUD Sustainable Communities data.

Median sales price of an existing home in Ogden is \$100,000 lowest of any Weber County city.

The median sales price of an existing home in Ogden is \$100,000, the lowest of any of the Weber County study cities. The affordability is extreme in Ogden City. Ninety-one percent of all homes sold in the past five years were affordable to households at 80 percent Area Median Income (AMI) and 52 percent were affordable to households at 50 percent AMI. Of the 921 condominiums sold since 2007, 895 or 97.2 percent were affordable to moderate income families and 68 percent affordable to low income families at 50 percent AMI.

Median sales price of an existing home in Ogden is \$100,000
Median price for a new home in Ogden \$160,000 affordable to moderate income households.

New home construction in Ogden is affordable to moderate income families (80 percent AMI). The median price of a new home has been around \$160,000 over the past several years. At current interest rates a moderate income household should be able to afford a home priced at \$200,000 or less.

80% of new homes sold in Ogden were affordable and
90% of existing homes sold were affordable to moderate income families (80% AMI), since 2005

Of the nearly 582 new homes sold since 2005, 80% or 460 were affordable to moderate income households Table 9. However, new homes were not affordable to low income households. In the past five years no new homes have been built for \$120,000 or less, a price affordable to households at 50 percent of AMI.

The sale of existing homes shows that nine out of ten homes sold were affordable to the moderate income household. Of the 6,059 homes sold 5,516 were affordable to households at 80 percent AMI Tables 10-12. For low income households 52 percent or 3,136 homes were affordable to low income (50% AMI) households. Over the past five years 921 existing condominiums were sold in Ogden City. Ninety-seven percent were affordable to moderate income (80% AMI) households and 68 percent were affordable to the low income households Tables 13-14.

Housing prices have fallen 22%, condominiums prices have fallen 26% in the past four years.

Housing prices in Ogden have fallen 22 percent in the past four years and condominiums prices have fallen 26 percent Table 10. The sample of homes sold is relatively small but sold data do provide an indication of the direction of housing prices. Housing prices are declining in part due to short sales and foreclosed properties. Short sales and foreclosures account for about 30 percent of all home sales Table 15. These properties are heavily discounted and push the median sales price down. Median sales price of REO properties in 2011 was \$59,000 Tables 16.

The concentration of moderate and low priced housing in Ogden results in little price diversity.

Life cycle housing is not a housing alternative. Families desiring to stay in the community but wanting to move to a larger, higher quality home have very few housing choices other than to move to other county alternatives.

It will require a broader regional effort to successfully de-concentrate segregated neighborhoods in Ogden

In order to advance housing choice, the City strives to find the right balance between reinvestment and redevelopment in racially concentrated areas versus development of new housing opportunities inside and outside of such areas. However, with half of Ogden's Census Tracts have a population reaching more than 20% poverty, the City is severely limited in achieving this goal. Consequently, it will require a broader regional effort to successfully de-concentrate segregated neighborhoods in Ogden City.

Rental Housing

Nearly all rental housing in Ogden is affordable to LMI households.

Nearly all rental housing would be affordable to Low- to-Moderate Income (LMI) households given the low housing costs in the City.

Rental housing is highly concentrated in Ogden, 60% of Weber Co. rentals units are in Ogden.

Rental housing is highly concentrated in Ogden City with nearly 60 percent of all rental units in the county located in Ogden. Roy is the only other city with more than 10 percent of their housing stock devoted to rental housing. Many neighboring cities have less than 1 percent of housing stock in rental units (Table 32 Page 35). Map 2 (Page 32) shows number of rental units by census tract in Ogden..

Rental Assisted Housing

81% of Weber County vouchers holders live in Ogden.

76% of all County tax credit units are in Ogden.

89% of County HUD deep subsidized housing units are in Ogden.

Over 70 percent of Weber County rent-assisted households (vouchers, tax credit units, public housing units) live in Ogden and 60 percent of all renters. Eighty-one percent of voucher holders also live in Ogden and 73 percent of all tax credit units are located in the city. This concentration is a reflection of zoning ordinances and policies of many of the non-entitlement cities. Eight cities have less than 20 percent rental inventory; including Roy the second largest city in the county (population 37,500) with proximity to I-15 and large employment base and a FrontRunner station.

Restricted supply of Section 8 Vouchers has a disparate impact on minorities, disabled and large families.

The limited supply of Section 8 vouchers has a disparate impact on minorities, Hispanics, disabled individuals and large families. These protected classes currently represent about 60 percent of voucher holders in Weber 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 cities 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.

A high percent of tax credit and deep subsidy units are located in Ogden. Seventy-six percent (1,362 units) of tax credit units are located in Ogden and 89 percent (774 units) of deep subsidy HUD units are in Ogden.

IV. Housing Needs Summary

Surplus of Affordable Rental Housing in Ogden

Ogden has a surplus of 4,028 affordable rental housing units.

HUD data shows a need of 177 units for extremely low income households (<30% AMI) in Ogden, a surplus of 2,313 units for very low income households (30%-50% AMI) and a surplus of 1,891 units for low income households (50%-80% AMI). The surplus of affordable units is due, in part, to the large number of affordable rental units in the city. Low rental rates are partly a reflection of the student market which tends to hold rents down.

Table 8
Deficit/Surplus of Affordable Rental Housing Units by Income
(shaded area = affordability)

| | <30% AMI Deficit/Surplus | 30%-50% AMI Deficit/Surplus | 51%-80% AMI Deficit/Surplus | Total |
|----------------------|-----------------------------|--------------------------------|--------------------------------|--------|
| Farr West | -85 | -174 | -264 | -523 |
| Harrisville | -98 | -189 | -288 | -575 |
| Hooper | -98 | -186 | -294 | -578 |
| Marriott-Slaterville | -39 | -59 | -105 | -203 |
| North Ogden | -329 | -478 | -782 | -1,589 |
| Ogden | -177 | +2,313 | +1,891 | +4,028 |
| Plain City | -88 | -163 | -249 | -501 |
| Pleasant View | -141 | -181 | -255 | -578 |
| Riverdale | -168 | -200 | -315 | -683 |
| Roy | -566 | -865 | -1,282 | -2,712 |
| South Ogden | -320 | -317 | -479 | -1,116 |
| South Weber | -106 | -172 | -249 | -526 |
| Washington Terrace | -141 | +27 | -65 | -179 |
| West Haven | -117 | -174 | -174 | -464 |
| Weber County | -2,678 | -1,207 | -3,442 | -7,327 |

Source: HUD Sustainable Communities spreadsheet for grantees.

Table 8 shows the need for affordable units by city. These estimates were generated by HUD in 2011 for the Equity Assessment analysis required of Sustainable Communities grantees. A HUD Sustainable Communities grant was awarded to Salt Lake County as the fiscal agent, and Envision Utah and Wasatch Front Regional Council as the managing partners. This grant includes a regional housing plan for the four Wasatch Front Counties; hence HUD developed the affordable housing need estimates that appear in Table 42. The negative numbers for low (80% AMI in HUD terminology) and very low (50% AMI for HUD) income households in Ogden City reflect the extreme affordability of the city, both in terms of rental and owner occupied units. However, the need for extremely low income (30% AMI) housing units in Ogden is 177 units. The cumulative number of units needed for the cities studied indicates an important fact: a shortage of affordable housing for extremely low income households.

Aging Housing Stock

Ogden's old housing stock increases the need for housing rehab programs.

In Ogden the number of housing units increased by 2,700 units over the past ten years, a 9 percent increase in the inventory. Ninety percent of the housing inventory of Ogden City was built prior to 2000. The housing stock in Ogden is relatively old with a median age of 45 years. The “old” housing stock increases the need for programs that are targeted at addressing deferred maintenance, rehabilitation and improving energy efficiency.

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.

Rental housing is the primary source of housing for protected classes.

Although Ogden has a surplus of affordable rental housing, the most critical unmet housing needs exist 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 21,260 renter households in Weber County 45 percent or 9,500 households were very low and extremely low-income households *Table 1*. There were about 5,520 renter households with extremely low-income. Again these renter households are much more likely to be households of protected classes; minority, Hispanic, disabled, or large family.

While an excess of supply of affordable housing in Ogden City has depressed housing sales. There is a disparity in housing markets among cities within Weber County, with the lowest sales prices occurring in Ogden. The City’s NRSA minority households have a median income equivalent to only 61% of the White household income, minority residents are more likely to experience neighborhood limitations in locating an affordable home to purchase.

The need is to expand affordable housing in non-concentrated areas.

This situation underscores the need to expand affordable housing opportunities in non-concentrated areas, though it would not be possible for government to subsidize enough housing to satisfy the unmet need of persons who are not paid a living wage.

Minimum-wage earners and single-wage-earning households cannot afford a housing unit renting for the HUD fair market rent in Ogden. This situation forces these individuals and households to double up with others or lease inexpensive substandard units. Minorities and female-headed households are disproportionately impacted due to their lower incomes.

Supportive Housing for Disabled

There are currently 1,100 disabled individuals living in rental units in Weber County that are very low-income households with severe housing cost burdens and non-elderly. These individuals confront many housing impediments. A targeted effort to develop HUD 811 housing would provide supportive rental housing for these extremely low and very low-income disabled adults. A coordinated approach should be considered by the two entitlement cities to develop on a regular basis 811 projects to further fair housing for the disabled. These efforts should include a public private partnership with non-profit developer(s) and approached from a regional perspective; that is coordinated among the entitlement cities and non-entitlement cities.

V. Policies and Practices

Public Policy, Zoning and Land Use Element

Lack of a regional approach is likely one cause of the concentration of affordable rental housing and low and very-low income households in Ogden.

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 to reduce the concentration of protected class households in Ogden. Lack of a regional approach is likely one cause of the concentration of affordable rental housing and low and very low-income households in Ogden and some of the cities in the south-end of the county.

Ogden does not need to provide incentives for affordable housing.

Ogden has a 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, probably are restricted in some non-entitlement cities. Ogden has inclusionary zoning and allows accessory units. The city does not have density bonuses for affordable housing or fee waivers. Ogden does not need to provide incentives for affordable housing.

“If some of the northern cities provided incentives, over the long-term there would be less concentration of protected classes in Ogden and housing opportunities would be expanded for protected classes.” BEBR

Nimbyism, Zoning, and Land Prices

If the higher income cities in Weber 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. BEBR

Regionally, Nimbyism, Zoning, and Land Prices Lead to Concentrations of Affordable Housing and greatly impacts and potentially further concentrates low-income and minority housing in Ogden. “Zoning practices and development approvals have a greater impact than any other factor on fair housing choice. If the higher income cities in Weber 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.”

Lack of housing price diversity in some non-entitlement cities in the county, due in part to local zoning, has led to concentrations of low-income and poor minorities and ethnic groups in many neighborhoods in Ogden.

Transit Oriented Developments (TOD)

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. There is a TOD in downtown Ogden at 24th Street and Wall Avenue.

Utah State Legislature passed HB295

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.

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 required 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. Focusing solely on “their” jurisdiction, a city is left without any regional context regarding the location and need for affordable housing and the disparities of opportunities across cities in the region (county). Housing markets do not stop at a jurisdiction’s boundaries. Housing markets are highly interrelated and interdependent with surrounding jurisdictions. Weber County is a regional housing market and Ogden is a subset of this regional market.

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.

Language Assistance Plan and Fair Housing Infrastructure

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. Ogden’s fair housing infrastructure is one of the most complete of any city in the Wasatch Front. However, the fair housing website is only in English. The city does provide language interpreters.

Ogden’s Fair Housing infrastructure is one of the most complete, but is limited to English.

VI. Legal Status / Fair Housing Complaints

Utah Antidiscrimination and Labor Division

The Utah Antidiscrimination and Labor Division data on discrimination complaints also includes complaints made to HUD. Over the past six years, 38 complaints in Weber County have been filed see *Table below*. The basis of 63 percent of these complaints has been discrimination due to disability. Disability leads all categories in perceived reason or basis for the complaint followed by retaliation at 26

percent and family status at 16 percent. These data raise concerns that discrimination is impeding fair housing choice for households with disabled individuals and “too” many family members.

63% of Weber Co FH complaints deal with denial of a “reasonable accommodations”

Housing Discrimination Complaints Filed to State of Utah and HUD (Weber County)

| | Disability | Sex | Family Status | Race | Retaliation | Source of Income | Religion | National Origin | Color | Total |
|-------|------------|-------|---------------|-------|-------------|------------------|----------|-----------------|-------|--------|
| 2007 | 7 | 1 | 4 | 1 | 3 | 1 | 0 | 1 | 0 | 11 |
| 2008 | 8 | 2 | 0 | 3 | 3 | 1 | 0 | 2 | 0 | 13 |
| 2009 | 2 | 1 | 1 | 1 | 1 | 0 | 0 | 0 | 0 | 3 |
| 2010 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 4 |
| 2011 | 3 | 0 | 0 | 0 | 3 | 0 | 0 | 0 | 0 | 3 |
| 2012 | 1 | 1 | 1 | 0 | 0 | 1 | 0 | 1 | 0 | 4 |
| Total | 24 | 5 | 6 | 5 | 10 | 3 | 0 | 5 | 0 | 38 |
| Share | 63.2% | 13.2% | 15.8% | 13.2% | 26.3% | 7.9% | 0.0% | 13.2% | 0.0% | 100.0% |

Source: Antidiscrimination & Labor Division, State of Utah

Utah Legal Services

Utah Legal Services data suggest there is no race or ethnicity discrimination in filing FH complaints.

Utah Legal Services data show that 48 percent of “Cased Call” reports the basis of the complaint as disability. The race and ethnicity of individuals filing complaint is consistent with state demographic patterns. Seventy-five percent of those filing complaints were white and 13 percent were Hispanic. Data in (Tables 23-24 Page 45) do not suggest, at least for those filing complaints, a significant level of discrimination based on race or ethnicity.

Disability Law Center

DLC provides free advocacy to all protected classes in filing a FH complaint.

The Disability Law Center also fields calls regarding housing discrimination. Their data does not show the basis of the discrimination but show that in fiscal year 2013 50 individuals in Weber County filed complaints regarding housing discrimination *Table 25*. Of the complaints filed 84 percent were by non-Hispanic whites and 66 percent 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.

Reasonable Accommodations for the Disabled

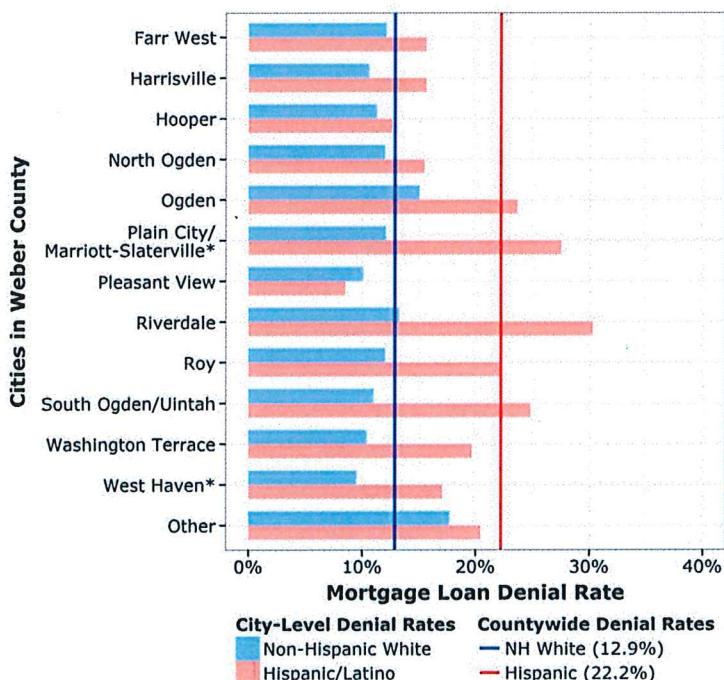
Many landlords are not aware of Fair Housing Act requirement to provide “reasonable accommodations” to persons with a disability

The number of disabled individuals in Weber County is estimated by the American Community Survey, U.S. Census Bureau to be 23,000 individuals, about 11 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 over one-third of all rental housing in Weber County is a detached single family unit. Many of the 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.

VII. Private Policies and Practices: Lending

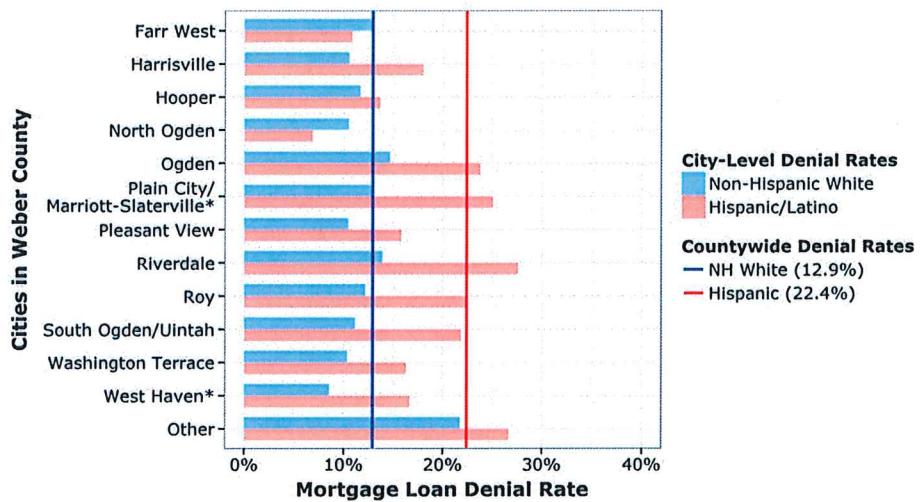
The disparities in homeownership across racial and ethnic lines reflect only the symptoms of underlying impediments in the home mortgage application process. The Home Mortgage Disclosure Act (HMDA) data was compiled for Weber County to better understand the barriers that members of the protected class face in obtaining mortgages. For illustrative proposes, 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. The focus of analysis is on Ogden which accounts for 78 percent of the county’s Hispanic mortgage applications and have Hispanic denial rates roughly twice as large as those of non-Hispanics.

Figure 1 - Percent of Mortgage Loan Applications Denied by Race/Ethnicity in Weber County Incorporated Cities, 2006–2011



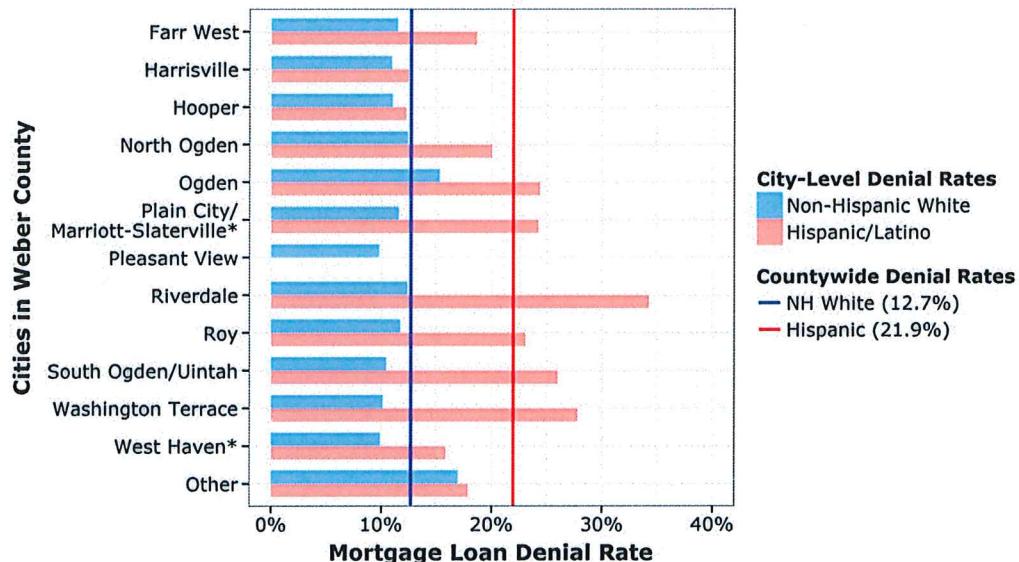
Source: HMDA LAR Raw Data by MSA (2006–2011) Note: The categories Plain City/Marriott-Slaterville and West Haven include unincorporated areas in the western region of Weber County, which are contained within the census tracts that encompass the three cities.

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



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

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



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

Note: The categories Plain City/Marriott-Slaterville and West Haven include unincorporated areas in the western region of Weber County, which are contained within the census tracts that encompass the three cities.

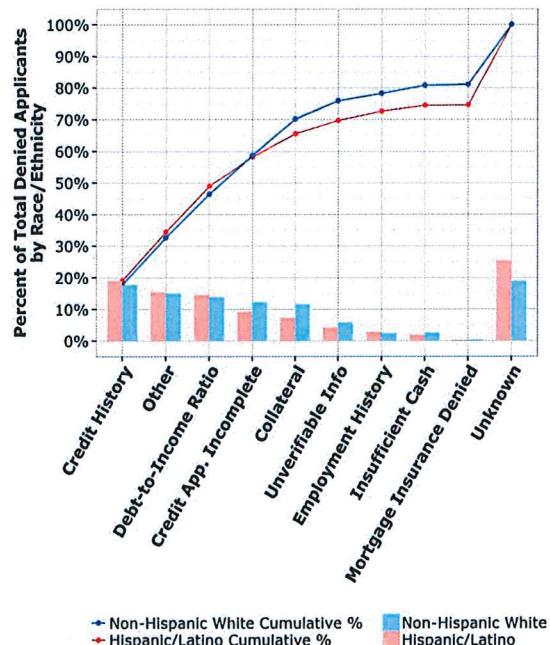
Figure 2 shows the denial rates among white and Hispanic applicants with reported incomes at or below 80 percent HAMFI (median family income), while Figure 3 shows the denial rates for applicants with reported incomes above 80 percent HAMFI. Note that the reported incomes for applicants from 2006 to 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 around 22 percent, while the white denial rate is roughly 13 percent—regardless of income bracket. More pertinent are the cities with the largest Hispanic application volume such as Ogden and Roy, which have denial rate gaps greater than 9 percentage points regardless of income brackets. Similarly, in West Haven, which has the third highest application volume in Weber County, the Hispanic denial rate is sustained at levels above 15 percent for both income brackets, whereas non-Hispanic denial rates are below 10 percent. Thus, while many smaller cities have fluctuations in denial rates attributed to low application volume, the cities with the largest Hispanic application volume have not experienced clear denial gap closures with the disaggregation by income bracket.

The significantly higher denial rates for home mortgages for Hispanics suggests a financial impediment to fair housing choice for Hispanics and all minorities. Denial rates for Hispanics in Ogden are twice as high as denial rates for whites even after adjusting for income. Furthermore, if a Hispanic household receives loan approval that household is nearly two times as likely to have a high interest loan as a white household.

Ogden Hispanics are twice as likely to be denied a mortgage and once approved two times more likely to have a higher interest loan than white households (even adjusted for income).

Despite the persistent disparity in mortgage outcomes between the two groups, other factors such as credit history could be the driving force behind the mortgage denials. Note that 19 percent and 25 percent of the denials for white and Hispanic/ Latino applicants, respectively, did not have a documented reason for denials. Roughly 30 percent and 28 percent of the denials among non-Hispanic white and Hispanic/Latino applicants, respectively, are due to poor credit history or 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.



Thus, income could be one minor driving force in the disproportionality of mortgage denials among the lowest-income Hispanic applicants but does not explain the pervasive approval rate gaps across nearly all income deciles.

V. Impediments to Fair Housing Choice and Action Steps

IMPEDIMENT 1

Uneven Fair Housing infrastructure - Fair Housing brochures, webpage and materials are printed only in English, limiting the available of Fair Housing information to non-English speaking persons. There is a need to improve language access for people with Limited English speaking proficiency who seek information regarding Fair Housing.

ACTION ITEMS

1. Develop and implement a **Language Assistance Plan (LAP)** for Ogden City. Federal policies under Title VI of the 1964 Civil Rights Act set benchmarks by which jurisdictions like Ogden must assure meaningful access to federally funded services. Under guidelines issued by the HUD, cities that receive CDBG and HOME program funds, are required to evaluate the need for language assistance services by individuals with limited English speaking proficiency (known as LEP individuals) who come into contact with city services by examining four factors: (1) the number of LEP individuals likely to be needing and requesting services; (2) the frequency of contact city agencies have with LEP Individuals; (3) the nature and importance of the contacts LEP Individuals have with city agencies; and (4) the resources available for language assistance activities. A LAP will identify ways in which language assistance will be provided – thereby outreaching effectively to the LEP community regarding Fair Housing Choice, as well as, other City services.
2. Translate the City's **Fair Housing webpage** and vital program documents in Spanish; and print from HUD's website and make available informational pamphlets and Fair Housing brochures for LEP individuals.
3. Continue to provide citizens with consistent **Spanish translation services**. Utilizing a private contractor to test and certify employees, so that quality translation services are available to LEP individuals.
4. Establish a centralized list of resources for assisting LEP individuals, by utilizing the City's Intranet. Posting the LAP and a list of City employees who are certified interpreters on the City's Intranet will assist in consistent and even Fair Housing infrastructure, as well as, consistent access to City programs.
5. Encourage the **Disability Law Center (DLC)** (a recipient of HUD's Fair Housing Initiatives Program (FHIP) Grant) to take the lead in establishing a database to track Fair Housing complaints or legal actions for the region, thereby establishing a centralized administration of Fair Housing infrastructure.
6. Participate in a **Regional Analysis of Impediments to Fair Housing Choice**.

IMPEDIMENT 2

Deteriorating Quality of Housing Inventory in RCAPs- Ogden's housing stock is aging in Ogden's NRSA. This along with the prevalence of low-income households and minority concentrations in the NRSA, presents the challenge of deferred maintenance and deteriorating quality of housing stock. Homes in the East Central and NRSA particularly, are disproportionately occupied by minority and disabled individuals (seniors with a highly likelihood of disability). An analysis of age and value of homes in Ogden indicates several neighborhoods where there are a large number of homes built prior to 1950 and valued at less than \$100,000. There is a relatively high probability these homes are subject to deferred maintenance

and deteriorating quality. Programs to rehabilitate, renovate, and repair structures and/or improve energy efficiency would affirmatively further fair housing.

ACTION ITEMS

1. Implement **Quality Neighborhoods Program** to target resources to improving the condition of housing in the NRSA. Quality Neighborhoods works towards providing additional housing options, and when possible, developing new quality housing available to LMI and moderate-income households in the NRSA, to improve overall housing conditions through the reduction and elimination of substandard housing, to provide more price diversity, to encourage life cycle housing options, and to de-concentrate poverty. Newly constructed housing units will be built with three bedrooms and when possible with basements to accommodate larger families. Due to the water table, basements are not always an option.
2. Partner with local lenders and non-profit groups and social investment companies to expand CED's access to funding to improve the quality of housing in the NRSA that has two RCAP Census Tracts.
3. Continue to implement HUD's **Asset Control Area (ACA)** program to improve the quality of housing in Ogden's high minority and high poverty East Central neighborhoods.
4. Provide assistance for housing rehabilitation to all income levels through the **Home Exterior Loan Program (HELP)**. The HELP program provides a low interest loan to homeowners in need of exterior repairs and repairs to address housing code issues, improving the quality of housing in Ogden.
5. The City maintains a comprehensive **infrastructure plan** which has an infrastructure replacement schedule that bonded for significant improvements in the NRSA area over the next decade. When infill projects require consolidation of properties, infrastructure improvements are included and implemented when possible in the project.
6. Collaborate with Ogden School District, Utah State Division of Workforce Services (DWFS) and community service agencies to align the workforce with industry educational standards and to improve educational opportunities in the NRSA through programs such as STEM, Custom Fit, Next Generation Kids, Utah Advanced Materials and Manufacturing Initiative (UAMMI) and Promise Zone. Ogden School District 12,400 students. Over 56% of Ogden students are ethnic minorities and 75% come from low-income homes. The district is celebrating four years of progress in student proficiency and graduation rates.

To end the concentration of poverty in the NRSA, the City has actively participated and collaborated with and will continue to support the following initiatives:

- a. **STEM** goals include increasing students' mastery levels in mathematics, increasing enrollment in current engineering and information technology certificate programs. STEM after-school programs, camps, tutoring and mentoring programs will also be developed and implemented, along with teacher training and STEM teacher incentive pay programs. The City has partnered with Ogden and Weber School Districts for a STEM outreach program.
- b. Funded by Utah DWFS, as part of the Utah Intergenerational Poverty Mitigation Act passed in 2012, the **Next Generation Kids** program works toward ending intergenerational poverty by disrupting the cycle of poverty through working with parents and kids together.
- c. **Custom Fit** Training & Workforce Development Program is an employer training service provided by the Ogden Weber Tech College. Custom Fit Training offers flexible, customized training programs, designed to enhance and retain the skills and abilities of employees in order to keep Utah companies competitive and stimulate economic development.
- d. **Utah Advanced Materials and Manufacturing Initiatives (UAMMI)** is a regional effort to advance educational opportunities and works to expand economic opportunities through capital development, workforce development, economic ecosystem (infrastructure)

development, market development and most important international competition and innovation development.

e. **Promise Zones** is a HUD initiative to provide interagency collaborative support and grant funding to revitalize high poverty communities where the federal government will partner with and invest in communities to create jobs, leverage private investment, increase economic activity, expand educational opportunities, and reduce violent crime.

7. Continue to implement **Transit Oriented Development (TOD)** opportunities.

- a. In walking distance to Ogden's Historic 25th Street, the Central Business District, and the IRS (a major area employer) Ogden's intermodal hub has provides transportation to employment centers for many Ogden residents. In an effort to redevelop under-utilized property and support the development of a Transit Oriented Development (TOD) near Ogden's intermodal transit hub, Ogden has committed to the acquisition of properties adjacent to the UTA parcels located adjacent to the intermodal hub. The properties Ogden plans to acquire are bordered by Wall Ave, Reeves Ave, 21st and 22nd Streets, and equate to approximately 7.5 acres of land. These properties, as well as a portion of the UTA parcels, are within the existing 21st – 22d Street Redevelopment Area, and are part of Ogden's existing Wall Avenue Retail Corridor Master Plan. They are also conveniently located within walking distance of the IRS campus, which is one of Ogden's largest employers. This location offers very high visibility with frontage on Wall Avenue, which has a traffic count of 23,125 cars per day. Ogden's objective is to create a complimentary use to UTA's existing infrastructure and developable land, while adhering to the existing Wall Avenue Master Plan. In addition, increasing Ogden's sales and property tax bases are primary goals along with providing a diverse mix of uses, along with affordable housing units available to LMI households and quality housing units available to moderate income households that would best fit this location and assist Ogden in reaching these goals.
- b. Partner with UTA to complete the Ogden-Weber State University Transit Project study. The study's purpose is to Increase mobility, connectivity and travel choices between downtown Ogden and the WSU/McKay-Dee Hospital area; Promote economic and community development and create jobs in Ogden City; Support local and regional land use initiatives; Increase ridership, attract more local riders and provide improved access to overall transit system; Improve regional transit reliability; Provide increased connectivity to bicycle and pedestrian friendly facilities; and develop a project that has strong local support and is competitive for federal funding.
- c. Ogden City provides a Lunch and Learn for employers to address TOD housing options to their employees.

8. Identify solutions to **food deserts** in Ogden.

- a. The City will partner, when possible, with investors and property owners to develop the 24th Street Village Center located in Census Tract 2009 identified as a RCAP and that has few grocery stores and limited access to food options.

9. De-concentration of low-income housing and poverty in Ogden.

- a. With an excess of 4,000 affordable housing units in Ogden while neighboring communities have a deficit of affordable housing, the City has worked, negotiated and tried various approaches to partner with local communities and Weber County to bring about equitable solutions to RCAP's. In addition, the City has engaged the State to develop solutions. Without a state or federal mandate or incentives, other communities are unwilling to take efforts to provide LMI housing in their communities, which would work to end the concentration of low-income housing in Ogden. If the State or Federal government do not provide the pressure or support needed to end nimbysim in Weber County, the City may continue to face the regional problem of RCAP's alone with very limited authority and funding to do so.

IMPEDIMENT 3

Disproportionate impact from Good Landlord program - (“refuse to rent to applicants with certain criminal backgrounds” – minorities disproportionately have higher criminal backgrounds.) The purpose of the program is to eliminate code violations and public nuisances among rental units. In exchange for running background checks and refusing to rent to applicants with certain criminal pasts, landlords receive a financial incentive. Many respondents of the Utah State Fair Housing Survey felt that these programs create barriers to housing for those individuals with past transgressions. Ogden’s good landlord program may be overly restrictive and have *disparate impacts* on protected classes. The requirements of the program should be refined. The program currently requires landlords to “refuse to rent to applicants with certain criminal backgrounds.” Although not intended to discriminate against protected classes, if minorities disproportionately have criminal backgrounds the Good Landlord program could be deemed a violation of the Fair Housing Act.

ACTION ITEMS

1. Continue to ensure consistency with Utah State law and evaluate program requirements relative to desired outcomes.

IMPEDIMENT 4

Landlords lack familiarity with Fair Housing Act - (many landlords are not aware of their responsibilities to provide “reasonable accommodations” as required by the Fair Housing Act.) The number of disabled individuals in Weber County is estimated at 23,000 individuals, about 11% 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 over one-third of all rental housing in Weber County is a detached single family unit. Many of the 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.”

ACTION ITEMS

1. Review the Good Landlord curriculum to ensure it adequately addresses the Fair Housing Act and particularly the Reasonable Accommodations requirements for landlords.
2. Work with state agencies and DLC to promote fair housing educational opportunities.
3. Work with the Utah Apartment Association’s to increase attendance at Fair Housing Tradeshow
4. Promote April as Fair Housing Month to increase the public’s awareness of the Fair Housing Act.
5. Utilize the FHEO logo in City documents to raise awareness of Fair Housing.

IMPEDIMENT 5

Local building inspectors lack familiarity with federal multi-family housing requirements.

Lack of familiarity of local building inspection offices with the International Building Code (IBC) and the federally assisted multi-family housing requirements can impact fair housing choice for disabled individuals. IBC and federal requirements mandate a percentage of multi-family units as accessible. Developers have completed apartment projects not in compliance due to an oversight by the building inspector.

ACTION ITEMS

1. Providing training opportunities for City employees whose duties impact fair housing such as building inspection, developing assisted housing or community/economic development activities.

IMPEDIMENT 6

High Denial Rates for Mortgage Loans to Hispanics - The significantly higher denial rates for home mortgages for Hispanics suggests a financial impediment to fair housing choice for Hispanics and all minorities. Denial rates for Hispanics in Ogden are twice as high as denial rates for whites even after adjusting for income. Furthermore, if a Hispanic household receives loan approval that household is nearly two times as likely to have a high interest loan as a white household. Higher denial rates of mortgage loan applications and a disproportionate share of high-cost loans among minority households have the effect of limiting access to mortgage products for these households.

Note: Although Ogden City agrees that there is a significantly higher number of Hispanics denied mortgages and Hispanics disproportionately have higher interest rates in Ogden, the data is inconclusive to determine the reason for the denials and higher interest rates. Ogden City CED contacted a leading local mortgage lender to inquire about the Weber County AI findings and the possible reasons for higher interest rates and higher rate of Hispanics denied mortgages. Poor credit history, no credit history and failure to follow-through with the mortgage application paperwork and process all are important factors which the research provided by U of U for the AI did not take into account.

Although the AI is inconclusive to determine that Hispanics are subject to discrimination based on ethnicity in mortgage lending in Ogden, the City will take the following steps to encourage fair housing choice.

ACTION ITEMS

1. Encourage USU Extension to offer Homebuyer Education class in Spanish in Ogden.
2. Encourage the DLC, Fair Housing to increase Fair Housing testing in Ogden and to include mortgage lending testing based on ethnicity.
3. Review all Own In Ogden homebuyer applications to ensure applicants are not victims of predatory lending.
4. Strengthen partnerships with local lenders and encourage lenders to offer homebuyer education and incentives to purchase homes in the City.

X. Signature for the City of Ogden

By my signature I certify that the *Analysis of Impediments to Fair Housing Choice for the City of Ogden* is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program regulations.



Mayor, Michael P. Caldwell

May 14, 2015

Date

Attest:
Lee Ann Peterson
Chief Deputy City Recorder

VI. General Data Tables, Maps and Figures

Source: 2012 Weber County Housing Assessment and Plan and Weber County Regional Analysis of Impediments for Fair Housing Equity Assessment

Minority Population Tables

Table 1
Population Estimates by Race and Ethnicity, 2010

| | Total Population | White | Minority | Hispanic | African American | Pacific Islander | Asian | Native American | Other |
|--------------|------------------|---------|----------|----------|------------------|------------------|-------|-----------------|-------|
| Weber County | 231,236 | 180,638 | 50,598 | 38,711 | 2,748 | 584 | 2,784 | 1,271 | 4,500 |
| Ogden | 82,825 | 55,557 | 30,268 | 24,490 | 1,553 | 241 | 966 | 701 | 1,867 |

Source: U.S. Census Bureau.

Population Estimates by Race and Ethnicity, 2010

| | Total Population | White | Minority | Hispanic | African American | Pacific Islander | Asian | Native American | Other |
|--------------|------------------|---------|----------|----------|------------------|------------------|-------|-----------------|-------|
| Weber County | 231,236 | 180,638 | 50,598 | 38,711 | 2,748 | 584 | 2,784 | 1,271 | 4,500 |
| Ogden | 82,825 | 55,557 | 30,268 | 24,490 | 1,553 | 241 | 966 | 701 | 1,867 |

Source: U.S. Census Bureau.

Table 2
Percent Share of Population by Race and Ethnicity, 2010

| | Total Population | White | Minority | Hispanic | African American | Pacific Islander | Asian | Native American | Other |
|--------------|------------------|-------|----------|----------|------------------|------------------|-------|-----------------|-------|
| Weber County | 100.0 | 78.1 | 21.9 | 16.7 | 1.2 | 0.3 | 1.2 | 0.5 | 1.9 |
| Ogden | 100.0 | 67.1 | 36.5 | 30.1 | 1.9 | 0.3 | 1.2 | 0.8 | 2.3 |

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 |
|--------------|------------------|----------------------|-------------------------|---|---------------------------------|
| Weber County | 231,236 | 23,257 | 13,647 | 8,798 | 16,604 |
| Ogden | 82,825 | 9,723 | 4,382 | 4,136 | 5,814 |

Source: U.S. Census Bureau.

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

| | Total Population | Disabled Individuals | Large Family Households | Single Parent with Child Under 18 yrs Households. | Households with Persons over 65 |
|--------------|------------------|----------------------|-------------------------|---|---------------------------------|
| Weber County | 100.0% | 10.1 | 17.3 | 11.2 | 21.1 |
| Ogden | 100.0% | 11.7 | 14.8 | 14.0 | 19.6 |

Source: U.S. Census Bureau.

Housing Tables and Maps

Table 3
Ogden: Housing Inventory Profile - 2010

| | Units | % Share |
|-----------------|--------|---------|
| Total Units | 32,482 | 100.0% |
| Occupied | 29,631 | 91.2% |
| Vacant Units | 2,851 | 8.8% |
| Owner Occupied | 17,093 | 57.7% |
| With Mortgage | 13,013 | 76.1% |
| Without | | |
| Mortgage | 4,080 | 23.9% |
| Renter Occupied | 12,538 | 42.3% |

Source: U.S. Census Bureau, 2010.

Table 4
Renters by Age of Householder - 2010

| | Units | % Share |
|--------------------|--------|---------|
| Less than 55 years | 9,842 | 78.5% |
| 55-64 years | 1,343 | 10.7% |
| 65-74 years | 691 | 5.5% |
| 75-84 years | 380 | 3.0% |
| 85+ years | 282 | 2.2% |
| More than 55 years | 2,696 | 21.5% |
| Total Renters | 12,538 | 100.0% |

Source: U.S. Census Bureau, 2010.

Table 5
Owners by Age of Householder - 2010

| | Units | % Share |
|--------------------|--------|---------|
| Less than 55 years | 9,970 | 58.3% |
| 55-64 years | 3,158 | 18.5% |
| 65-74 years | 1,858 | 10.9% |
| 75-84 years | 1,431 | 8.4% |
| 85+ years | 676 | 4.0% |
| More than 55 years | 7,123 | 41.7% |
| Total Owners | 17,093 | 100.0% |

Source: U.S. Census Bureau, 2010.

Table 6
Ogden: Owner Occupied Units by Race and Ethnicity - 2010

| | Units | % Share |
|--|--------------|--------------|
| Owner-occupied housing units | 17,093 | 100.0% |
| White alone householder | 13,455 | 78.7% |
| Black or African American alone householder | 213 | 1.2% |
| American Indian and Alaska Native alone householder | 74 | 0.4% |
| Asian alone householder | 215 | 1.3% |
| Native Hawaiian and Other Pacific Islander alone householder | 26 | 0.2% |
| Some Other Race alone householder | 17 | 0.1% |
| Two or More Races householder | 168 | 1.0% |
| Hispanic or Latino | 2,925 | 17.1% |

Source: U.S. Census 2010.

Table 7
Ogden: Renter Occupied Units by Race and Ethnicity - 2010

| | Units | % Share |
|--|--------------|--------------|
| Renter-occupied housing units | 12,538 | 100.0% |
| White alone householder | 8,208 | 65.5% |
| Black or African American alone householder | 389 | 3.1% |
| American Indian and Alaska Native alone householder | 173 | 1.4% |
| Asian alone householder | 137 | 1.1% |
| Native Hawaiian and Other Pacific Islander alone householder | 31 | 0.2% |
| Some Other Race alone householder | 22 | 0.2% |
| Two or More Races householder | 266 | 2.1% |
| Hispanic or Latino | 3,312 | 26.4% |

Source: U.S. Census 2010.

Table 8
Ogden: Residential Permits Issued by Type

| | Single Family | Town homes | Condo | Apartment | Manuf | Total |
|-----------|---------------|------------|-------|-----------|-------|-------|
| 2000 | 219 | 4 | 46 | 126 | 0 | 395 |
| 2001 | 186 | 28 | 11 | 11 | 2 | 238 |
| 2002 | 221 | 16 | 31 | 0 | 16 | 284 |
| 2003 | 250 | 14 | 8 | 20 | 2 | 294 |
| 2004 | 178 | 26 | 35 | 16 | 0 | 255 |
| 2005 | 154 | 16 | 14 | 0 | 25 | 209 |
| 2006 | 178 | 20 | 43 | 88 | 1 | 330 |
| 2007 | 91 | 10 | 13 | 15 | 0 | 129 |
| 2008 | 42 | 6 | 100 | 97 | 11 | 256 |
| 2009 | 65 | 6 | 17 | 0 | 8 | 96 |
| 2010 | 40 | 2 | 10 | 0 | 12 | 64 |
| 2011 June | 12 | 0 | 0 | 0 | 2 | 14 |
| Total | 1,636 | 148 | 328 | 373 | 79 | 2,564 |

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

Figure 1
Ogden: Residential Construction by Type

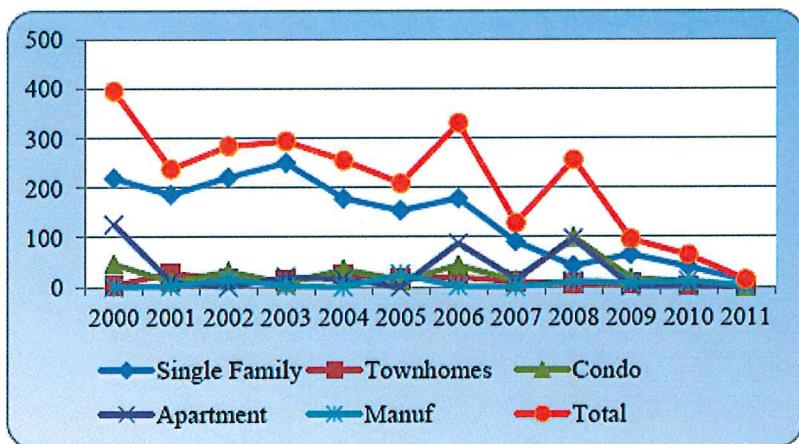


Figure 2
Ogden: Percent Share of Residential Construction 2000-2010

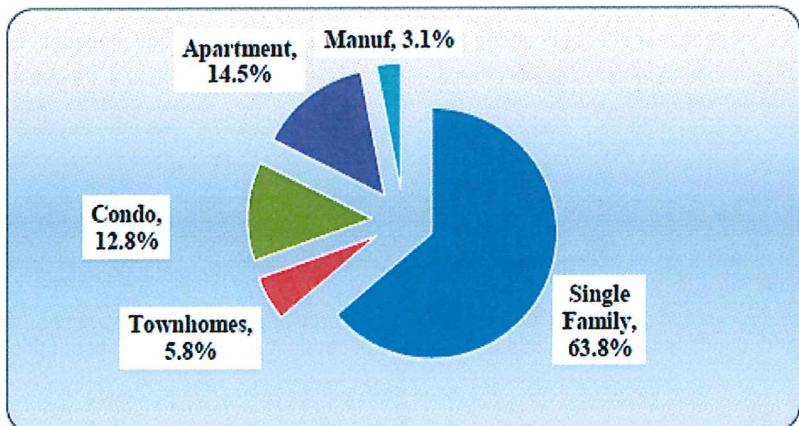


Table 9
Ogden: Price Characteristics of New Homes Sold

| | 2005 | 2006 | 2007 | 2008 | 2009 | 2010 |
|-----------------------------------|-----------|-----------|-----------|-----------|-----------|-----------|
| New Homes Sold | 82 | 146 | 148 | 61 | 78 | 67 |
| Median Price of New Homes | \$151,282 | \$160,344 | \$164,887 | \$158,750 | \$161,904 | \$167,948 |
| Number Homes Sold < Median | 41 | 73 | 74 | 31 | 39 | 34 |
| Number Homes Sold <\$200,000 | 79 | 124 | 110 | 43 | 61 | 45 |
| Percent Homes Sold for <\$200,000 | 96.3% | 84.9% | 74.3% | 70.4% | 78.2% | 67.1% |

Source: *New Reach*.

Table 10
Ogden: Median Sales Price of Existing Homes and Condos

| | Median Sales Price Homes | Median Sales Price Condos |
|------|--------------------------|---------------------------|
| 2005 | \$106,000 | \$84,450 |
| 2006 | \$114,000 | \$92,700 |
| 2007 | \$124,000 | \$109,950 |
| 2008 | \$128,773 | \$114,000 |
| 2009 | \$125,000 | \$110,000 |
| 2010 | \$116,425 | \$108,575 |
| 2011 | \$100,000 | \$84,300 |

Source: *Wasatch Front Regional MLS*.

Table 11
Ogden: Homes Sold That Were Affordable to Low (50% AMI) and Moderate Income (80% AMI) Households

| | Total Sales | Home <\$120,000* | Home <\$200,000** |
|-------|-------------|------------------|-------------------|
| 2007 | 1,804 | 1,002 | 1,663 |
| 2008 | 1,554 | 739 | 1,405 |
| 2009 | 1,040 | 445 | 928 |
| 2010 | 828 | 430 | 744 |
| 2011 | 833 | 520 | 776 |
| Total | 6,059 | 3,136 | 5,516 |

*\$120,000 affordable to 50%AMI; **\$200,000 affordable to 80% AMI

Source: *Wasatch Front Regional MLS*.

Table 12
Ogden: Percent of Homes Sold That Were Affordable to Low and Moderate Income Households

| | % Homes <\$120,000 | % Homes <\$200,000 |
|-------|--------------------|--------------------|
| 2007 | 55.5% | 92.2% |
| 2008 | 47.6% | 90.4% |
| 2009 | 42.8% | 89.2% |
| 2010 | 51.9% | 89.9% |
| 2011 | 62.4% | 93.2% |
| Total | 51.8% | 91.0% |

Source: *Wasatch Front Regional MLS*.

Table 13
Ogden: Condominiums Sold That Were Affordable to Low and Moderate Income Households

| | Total Sales | Condo <\$120,000* | Condo <\$200,000** |
|--------------|-------------|-------------------|--------------------|
| 2007 | 304 | 228 | 296 |
| 2008 | 254 | 158 | 249 |
| 2009 | 168 | 95 | 163 |
| 2010 | 116 | 74 | 111 |
| 2011 | 79 | 68 | 76 |
| Total | 921 | 623 | 895 |

*\$120,000 affordable to 50%AMI; **\$200,000 affordable to 80%AMI

Source: Wasatch Front Regional MLS.

Table 14
Ogden: Percent of Condominiums Sold That Were Affordable to Low and Moderate Income Households

| | % Condo <\$120,000 | % Condo <\$200,000 |
|--------------|--------------------|--------------------|
| 2007 | 75.0% | 97.4% |
| 2008 | 62.2% | 98.0% |
| 2009 | 56.5% | 97.0% |
| 2010 | 63.8% | 95.7% |
| 2011 | 86.1% | 96.2% |
| Total | 67.6% | 97.2% |

Source: Wasatch Front Regional MLS.

Table 15
Ogden: Short Sales and REO Sales

| | Short Sales* | REO Sales** | Combined Short Sales & REO Sales | Total Home Sales | SS & REO Sales as Percent of Total |
|------|--------------|-------------|----------------------------------|------------------|------------------------------------|
| 2008 | 6 | 34 | 40 | 1,040 | 3.8% |
| 2009 | 51 | 46 | 97 | 895 | 10.8% |
| 2010 | 80 | 155 | 235 | 828 | 28.4% |
| 2011 | 49 | 130 | 179 | 569 | 31.5% |

*Short sales defined as sale in which proceeds from selling the property will fall short of the balance of debt on the property. Lien holders accept less than owed.

**REO is defined as foreclosed real estate owned (REO) by a financial institution.

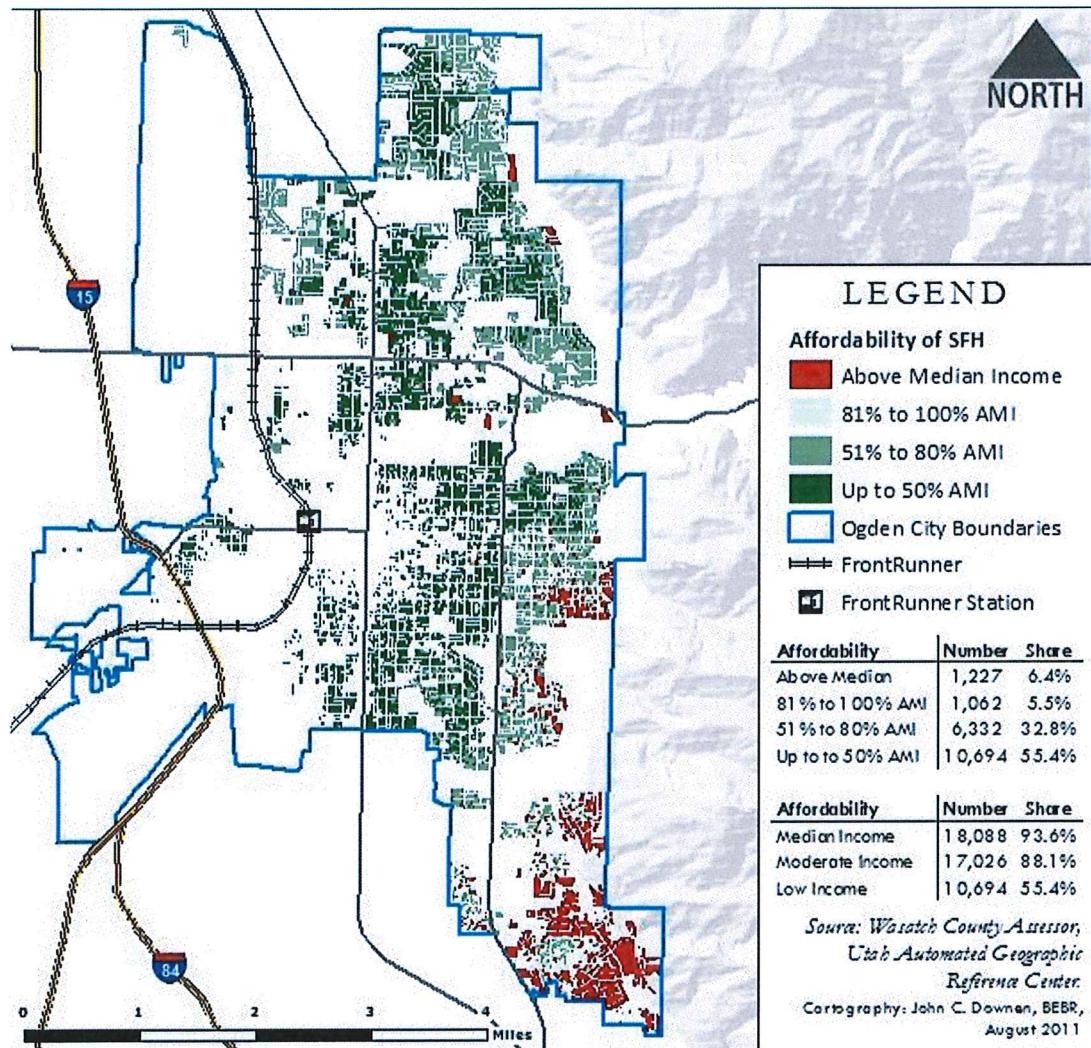
Source: Wasatch Front Regional MLS.

Table 16
Ogden: Median Sales Price of Short Sale and REO Homes

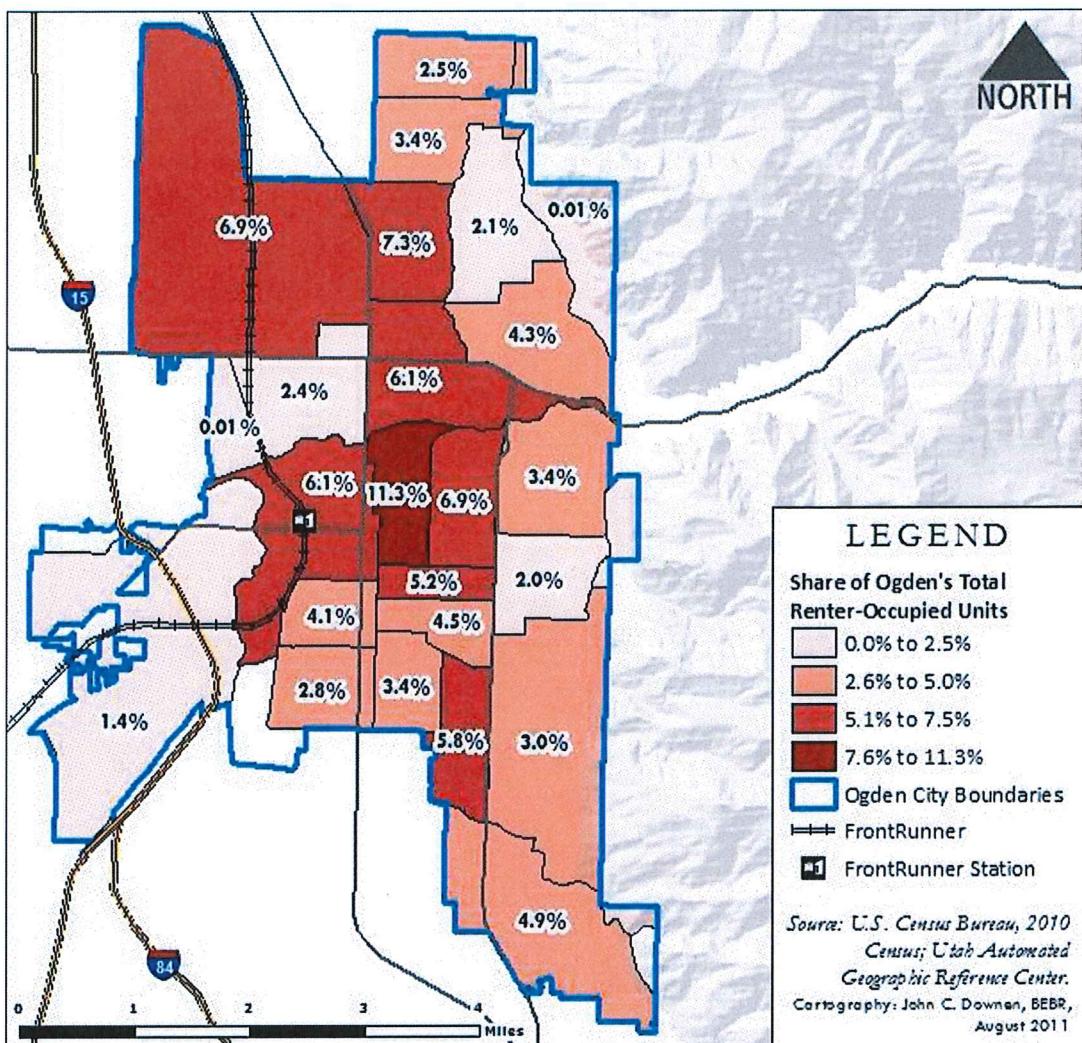
| | Short Sales | REO Sales | All Sales |
|------|-------------|-----------|-----------|
| 2008 | \$99,000 | \$70,500 | \$99,000 |
| 2009 | \$120,400 | \$71,500 | \$120,400 |
| 2010 | \$108,500 | \$72,975 | \$108,500 |
| 2011 | \$105,000 | \$59,000 | \$105,000 |

Source: Wasatch Front Regional MLS.

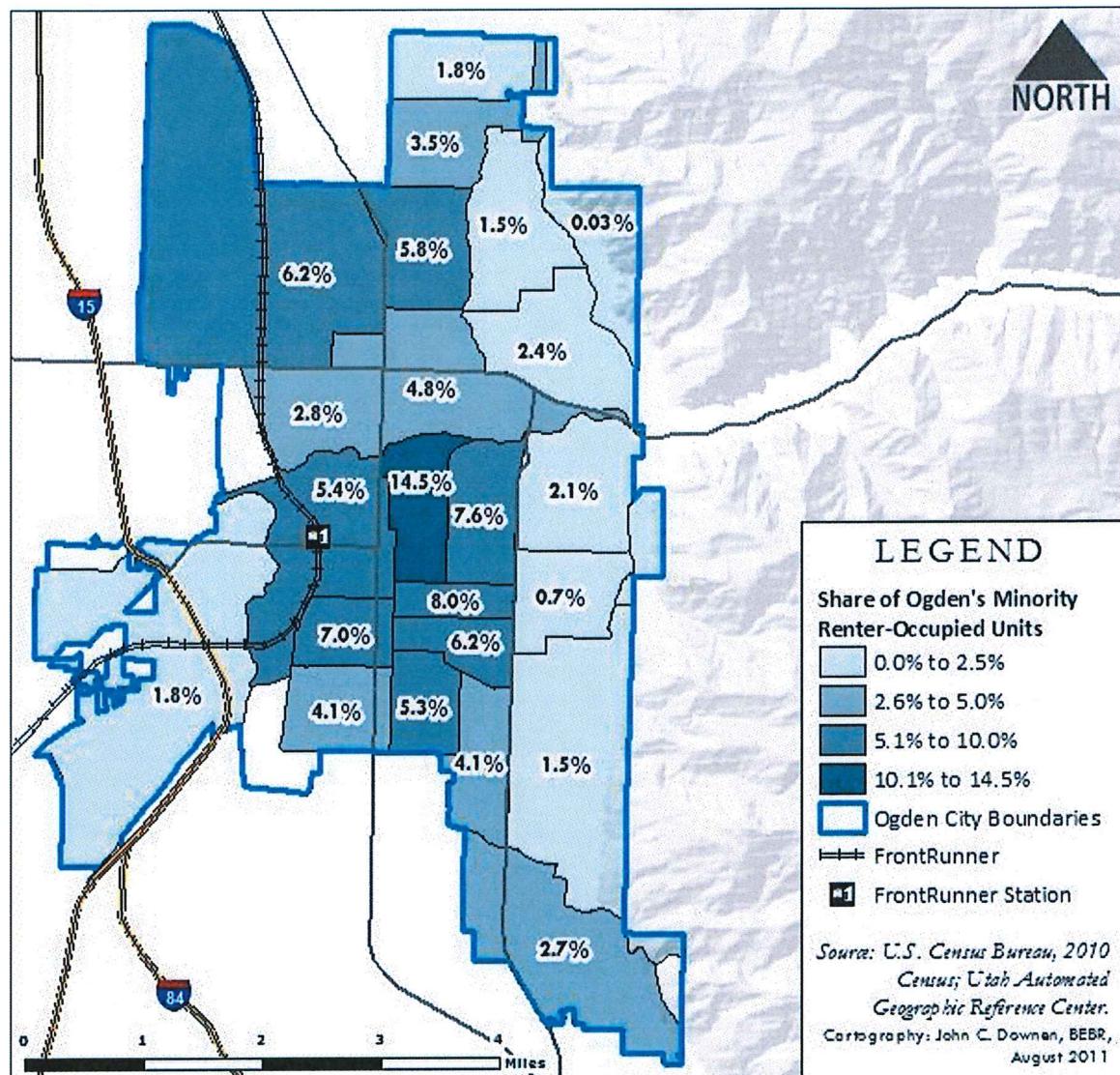
Map 1
Ogden City: Geographic Distribution of Affordable Single-Family Homes



Map 2
Ogden City: Share of City's Rental Units by Census Tract



Map 3
Ogden City: Share of Minority Renter Occupied Units by Census Tract



Comparative Housing Tables

Table 29
Total Housing Units by City

| | 2000 | 2010 |
|--------------------|--------|--------|
| Weber County | 70,454 | 86,187 |
| Ogden | 29,763 | 32,482 |
| Roy | 11,053 | 12,599 |
| South Ogden | 5,459 | 6,631 |
| Unincorporated | 5,004 | 6,319 |
| North Ogden | 4,562 | 5,799 |
| Washington Terrace | 3,162 | 3,462 |
| West Haven | 1,220 | 3,324 |
| Pleasant View | 1,895 | 2,548 |
| Hooper | 1,777 | 2,156 |
| Plain City | 1,001 | 1,654 |

Source: U.S. Census Bureau.

Table 30
**Cities Ranked by Absolute Change
in Owner Occupied Units**

| | 2000 | 2010 | Absolute Change |
|--------------------|--------|--------|--------------------|
| Weber County | 49,190 | 57,129 | 7,939 |
| West Haven | 1,045 | 2,439 | 1,394 |
| Roy | 9,010 | 9,963 | 953 |
| North Ogden | 3,993 | 4,917 | 924 |
| Hooper | 1,082 | 1,962 | 880 |
| Plain City | 895 | 1,509 | 614 |
| Pleasant View | 1,671 | 2,232 | 561 |
| Unincorporated | 4,130 | 4,574 | 444 |
| Ogden | 16,752 | 17,093 | 341 |
| South Ogden | 3,984 | 4,277 | 293 |
| Washington Terrace | 2,196 | 2,262 | 66 |

Source: U.S. Census Bureau.

Table 31
Percent Change in Owner Occupied Units

| | Percent Change |
|--------------------|----------------|
| Weber County | 16.1% |
| West Haven | 133.4% |
| Hooper | 81.3% |
| Plain City | 68.6% |
| Pleasant View | 33.6% |
| North Ogden | 23.1% |
| Unincorporated | 10.7% |
| Roy | 10.6% |
| South Ogden | 7.4% |
| Washington Terrace | 3.0% |
| Ogden | 2.0% |

Source: U.S. Census Bureau.

Table 32
Cities Ranked by Absolute Change in Renter Occupied Units

| | 2000 | 2010 | Increase |
|--------------------|--------|--------|----------|
| Weber County | 16,508 | 21,619 | 5,111 |
| Ogden | 10,632 | 12,538 | 1,906 |
| South Ogden | 1,209 | 1,927 | 718 |
| West Haven | 86 | 761 | 675 |
| Roy | 1,679 | 2,211 | 532 |
| Washington Terrace | 823 | 1,065 | 242 |
| North Ogden | 423 | 652 | 229 |
| Unincorporated | 386 | 543 | 157 |
| Pleasant View | 69 | 206 | 137 |
| Hooper | 68 | 120 | 52 |
| Plain City | 84 | 100 | 16 |

Source: U.S. Census Bureau.

Table 33
Cities Ranked by Percent Change in Renter Occupied Units

| | Percent Change |
|--------------------|----------------|
| Weber County | 31.0% |
| West Haven | 784.9% |
| Pleasant View | 198.6% |
| Hooper | 76.5% |
| South Ogden | 59.4% |
| North Ogden | 54.1% |
| Unincorporated | 40.6% |
| Roy | 31.7% |
| Washington Terrace | 29.4% |
| Plain City | 19.0% |
| Ogden | 17.9% |

Source: U.S. Census Bureau.

Table 34
**Apartments as Share of Additional
 Renter Occupied Units**

| | Increase | New Apts | Apts as % Share |
|--------------------|----------|-------------|--------------------|
| Weber County | 5,111 | 914 | 17.9% |
| South Ogden | 718 | 306 | 42.6% |
| West Haven | 675 | 429 | 63.5% |
| Ogden | 1,906 | 373 | 19.6% |
| North Ogden | 229 | 28 | 12.2% |
| Roy | 532 | 63 | 11.8% |
| Unincorporated | 157 | 18 | 11.5% |
| Washington Terrace | 242 | 12 | 5.0% |
| Pleasant View | 137 | 0 | 0.0% |
| Hooper | 52 | 0 | 0.0% |
| Plain City | 16 | 0 | 0.0% |

Source: U.S. Census Bureau.

Table 35
**Percent Change from Peak Year in Median Sales Price
 Of Single-Family Homes**

| | Peak Year Price | 2011 | % Decline |
|--------------------|--------------------|-----------|--------------|
| Weber County | \$168,000 | \$142,000 | -15.5% |
| Unincorporated | \$655,000 | \$258,000 | -60.6% |
| West Haven | \$289,900 | \$218,500 | -24.6% |
| Ogden | \$128,773 | \$100,000 | -22.3% |
| Hooper | \$269,425 | \$216,500 | -19.6% |
| North Ogden | \$222,747 | \$184,200 | -17.3% |
| Roy | \$169,000 | \$140,000 | -17.2% |
| Pleasant View | \$348,700 | \$296,050 | -15.1% |
| Plain City | \$277,500 | \$239,900 | -13.5% |
| South Ogden | \$189,950 | \$166,500 | -12.3% |
| Washington Terrace | \$139,900 | \$124,000 | -11.4% |

Source: Wasatch Front Regional MLS.

Table 36
**Percent Change from Peak Year in
 Median Sales Price of Condominiums**

| | Peak Year Price | 2011 | Percent Change |
|--------------------|-----------------------|-----------|-------------------|
| Weber County | \$132,900 | \$111,000 | -16.5% |
| Unincorporated | \$302,000 | \$109,000 | -63.9% |
| Pleasant View | \$246,329 | \$155,000 | -37.1% |
| Washington Terrace | \$185,000 | \$120,000 | -35.1% |
| West Haven | \$164,529 | \$119,000 | -27.7% |
| Ogden | \$114,000 | \$87,000 | -23.7% |
| North Ogden | \$150,100 | \$117,000 | -22.1% |
| Roy | \$130,000 | \$112,000 | -13.8% |
| South Ogden | \$128,950 | \$123,500 | -4.2% |
| Hooper | na | na | |
| Plain City | na | na | |

Source: Wasatch Front Regional MLS.

Table 37
**Percent of Home Sales REO
 and Short Sales**

| | Percent of Sales |
|--------------------|---------------------|
| Weber County | 30.3% |
| Pleasant View | 42.5% |
| West Haven | 40.9% |
| Ogden | 31.5% |
| Roy | 28.1% |
| Hooper | 28.0% |
| South Ogden | 26.0% |
| North Ogden | 24.1% |
| Washington Terrace | 22.0% |
| Plain City | 21.6% |
| Unincorporated | 11.6% |

Source: Wasatch Front Regional MLS.

Table 38
**Percent of Homes Sales at Less than \$200,000
 - 2007-2011**

| | Number Affordable | % Affordable |
|--------------------|----------------------|-----------------|
| Weber County | 10,596 | 72.2 |
| Washington Terrace | 429 | 91.5 |
| Ogden | 5,516 | 91.0 |
| Roy | 253 | 90.6 |
| South Ogden | 547 | 66.5 |
| North Ogden | 513 | 46.3 |
| Plain City | 68 | 21.0 |
| Hooper | 93 | 21.0 |
| West Haven | 160 | 24.4 |
| Unincorporated | 4 | 16.6 |
| Pleasant View | 56 | 14.9 |

Source: Wasatch Front Regional MLS.

Table 39
**Percent of Condominium Sales at Less than
 \$200,000 -2007-2011**

| | Number Affordable | % Affordable |
|--------------------|----------------------|-----------------|
| Weber County | 2,399 | 91.0 |
| North Ogden | 297 | 99.7 |
| Ogden | 921 | 97.0 |
| Roy | 219 | 100.0 |
| West Haven | 178 | 96.7 |
| South Ogden | 283 | 90.1 |
| Washington Terrace | 88 | 76.1 |
| Unincorporated | 56 | 50.0 |
| Pleasant View | 76 | 40.8 |
| Hooper | 0 | 0 |
| Plain City | 0 | 0 |

Source: Wasatch Front Regional MLS.

Table 40
Tax Credit Projects in Weber County

| Project | Address | City | Units | Yr. Built or Rehab | Type |
|--------------------------|-------------------------|--------------|-------|--------------------|-------|
| Mount Eyrie | 1225 North 454 East | Ogden | 38 | 1992 | Rehab |
| Marion Hotel | 184 25th Street | Ogden | 86 | 1992 | Rehab |
| McGregor Apartments | 810 East 25th Street | Ogden | 55 | 1992 | Rehab |
| Village Square | 545 Jefferson Avenue | Ogden | 80 | 1992 | New |
| Lorin Farr Crown Homes | Scattered Sites | Ogden | 13 | 1993 | New |
| Royal Hotel | 2522 Wall Avenue | Ogden | 20 | 1993 | Rehab |
| Elmhurst Apartments | 2432 Van Buren | Ogden | 15 | 1994 | Rehab |
| Ogden Crown 94 | Scattered Sites | Ogden | 6 | 1994 | New |
| Ridgeview Apartments | 710 North Washington | Ogden | 79 | 1994 | New |
| Mountain Glen Apartments | 5725 South Wasatch Dr | South Ogden | 80 | 1994 | New |
| Ogden Crown 97 | Scattered Sites | Ogden | 6 | 1997 | New |
| Washington Park Apts | 170 N. Washington Blvd | Ogden | 112 | 1997 | New |
| Fairview Apartments | 579 East 27th Street | Ogden | 32 | 2001 | Rehab |
| Country Woods Apts | 525 Park Boulevard | Ogden | 168 | 2002 | Rehab |
| Hoover Apartments | 330 27th Street | Ogden | 23 | 2002 | Rehab |
| Haven Pointe | 2265 South 1100 West | West Haven | 192 | 2002 | New |
| Kingstowne Apartments | 2245 Monroe Blvd | Ogden | 48 | 2003 | Rehab |
| Villa South Apartments | 3757 South Grant Ave | South Ogden | 120 | 2003 | Rehab |
| St. Benedict's Manor I | 3000 Polk Avenue | Ogden | 100 | 2005 | Rehab |
| Tamlyn Apartments | 1121 Sullivan Road | Ogden | 35 | 2005 | Rehab |
| Valencia Apartments | 461 27th Street | Ogden | 122 | 2005 | Rehab |
| Victoria Ridge | 291 10 th Street | Ogden | 48 | 2005 | New |
| St. Benedict's Manor II | 1469 Darling Street | Ogden | 40 | 2006 | Rehab |
| Liberty Junction | 2353 Junction Way | Ogden | 93 | 2007 | New |
| Kara Manor Apartments | 4960 South 425 West | Wash Terrace | 44 | 2007 | Rehab |
| Bramblewood Apartments | 173 East Dan Street | Ogden | 68 | 2008 | Rehab |
| Countryside Court | 650 N. Washington Blvd. | Ogden | 72 | 2008 | Rehab |
| Madison Manor | 2430 Madison | Ogden | 30 | 2010 | Rehab |
| Total | | | 1,825 | | |
| Built Since 2000 | | | 333 | | |
| Rehab | | | 1,116 | | |
| New | | | 709 | | |

Source: Utah Housing Corporation.

Table 41
HUD Subsidized Apartments in Weber County

| Project | Address | City | Units | Type |
|--------------------|---|--------------------|-------|----------|
| Apple Grove | 1333 Grant Avenue | Ogden | 28 | Family |
| Bramwell Court | 2625 Gramercy Avenue | Ogden | 18 | 811 |
| Fellowship Manor | 2334 Monroe Blvd | Ogden | 131 | Senior |
| Galloway | 2522,2525,2536 D Avenue | Ogden | 12 | Family |
| Garden Grove | 1155 23rd Street | Ogden | 20 | Senior |
| Golden Link Manor | 1132 24th Street | Ogden | 31 | Senior |
| Graham Court | 32nd & Lincoln Ave | Ogden | 15 | 811 |
| Kimi Lane | 663 22 nd Street | Ogden | 24 | Senior |
| Lomond Garden | 550 Grant Avenue | Ogden | 76 | Senior |
| Lincoln | 610 Lincoln Avenue | Ogden | 32 | Family |
| Massey Manor | 2515 F Ave | Ogden | 13 | Families |
| Normandie I | 610 1st Street | Ogden | 36 | Families |
| Normandie II | 610 1st Street | Ogden | 16 | Families |
| Ogden Senior Villa | 225 29th Street | Ogden | 32 | Senior |
| Osmond Heights | 630 East 23rd Street | Ogden | 40 | Families |
| RL Courts | 849 East 550 South | Ogden | 50 | Senior |
| Sierra | 235 & 251 28 th Street & 2865 Childs Avenue | Ogden | 28 | Family |
| Three Links Towers | 2427 Jefferson Ave | Ogden | 122 | Senior |
| Union Gardens | 468 3rd Street | Ogden | 50 | Senior |
| LaDawn | 1775 West 4800 South | Roy | 64 | Families |
| Heritage House | 300 East 5000 South | Washington Terrace | 34 | Senior |
| Total | | | 872 | |
| Senior | | | 570 | |
| Families | | | 269 | |
| Disabled | | | 33 | |

Source: HUD.

Table 42
Deficit or Gap of Affordable Housing by Participating Cities

| | Extremely Low Income | Very Low Income | Low Income |
|--------------------|-------------------------|--------------------|---------------|
| Roy city | 566 | 865 | 1,282 |
| Plain City | 88 | 163 | 249 |
| Hooper | 98 | 186 | 294 |
| Washington Terrace | 141 | -27 | 65 |
| West Haven | 117 | 174 | 174 |
| North Ogden | 329 | 478 | 782 |
| Ogden | 177 | -2,313 | -1,861 |
| South Ogden | 320 | 317 | 479 |
| Pleasant View | 141 | 181 | 255 |
| Unincorporated | 145 | 265 | 344 |
| Total | 2,123 | 288 | 2,031 |

Source: HUD Sustainable Communities data.

Poverty data, Tables and Maps

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

| | Poor White | Poor Minority | Total Poor | Minority Share of Poor | Total Population | % Poor |
|----------------------|------------|---------------|------------|------------------------|------------------|--------|
| Weber County | 13,487 | 10,281 | 23,768 | 43.3% | 209,730 | 11.3% |
| Farr West | 165 | 2 | 167 | 1.2% | 4,994 | 3.3% |
| Harrisville | 125 | 15 | 140 | 10.7% | 5,441 | 2.6% |
| Hooper | 144 | 54 | 198 | 27.3% | 5,118 | 3.9% |
| Marriott-Slaterville | 57 | 12 | 69 | 17.4% | 1,816 | 3.8% |
| North Ogden | 519 | 89 | 608 | 14.6% | 16,842 | 3.6% |
| Ogden | 8,408 | 8,345 | 16,753 | 49.8% | 80,349 | 20.9% |
| Plain City | 159 | 31 | 190 | 16.3% | 4,824 | 3.9% |
| Pleasant View | 244 | 98 | 342 | 28.7% | 6,627 | 5.2% |
| Riverdale | 383 | 36 | 419 | 8.6% | 7,936 | 5.3% |
| Roy | 1,155 | 541 | 1,696 | 31.9% | 34,441 | 4.9% |
| South Ogden | 786 | 273 | 1,059 | 25.8% | 15,203 | 7.0% |
| Washington | 474 | 304 | 778 | 39.1% | 7,988 | 9.7% |
| Terrace | 285 | 391 | 676 | 57.8% | 7,195 | 9.4% |

Source: HUD Spreadsheet for Sustainable Communities Grantees

Though the total percentage of poor people in Weber County was just over 11 percent, and about 43 percent of them were minorities, the poor populations varied greatly by city *Table 3*. By far the highest number of poor residents lived in Ogden, which is the largest city in the county. Almost 21 percent of all residents in Ogden were poor; a total of 16,750 individuals. In comparison, the next two highest concentrations by city were in Washington Terrace and West Haven with 9.7 percent and 9.4 percent, respectively. Ogden's poor population is nearly 50 percent minority. Only West Haven's poor population has a higher share or greater concentration of minorities. In West Haven 58 percent of the poor population is minority.

Figure 1 - Poor Individuals by Census Tract Weber County, 2010

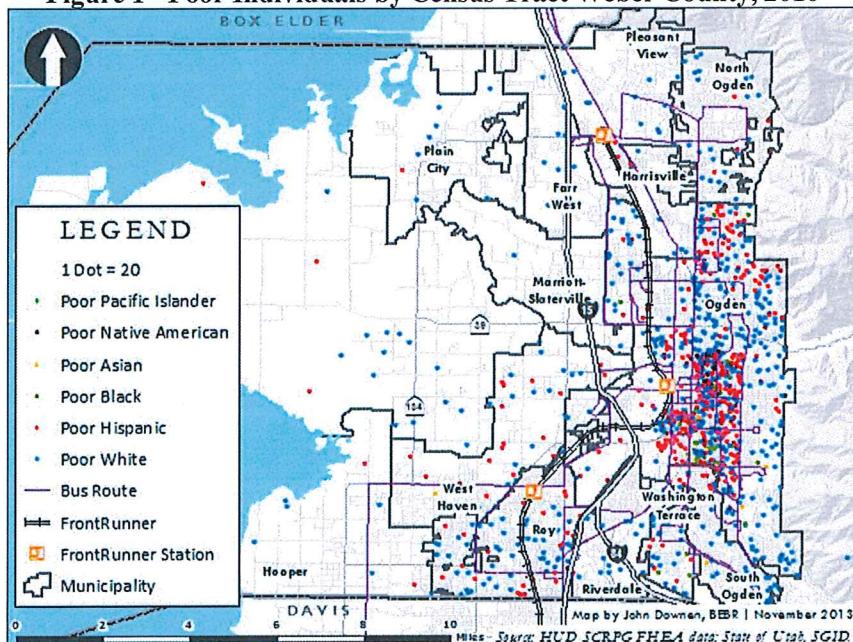
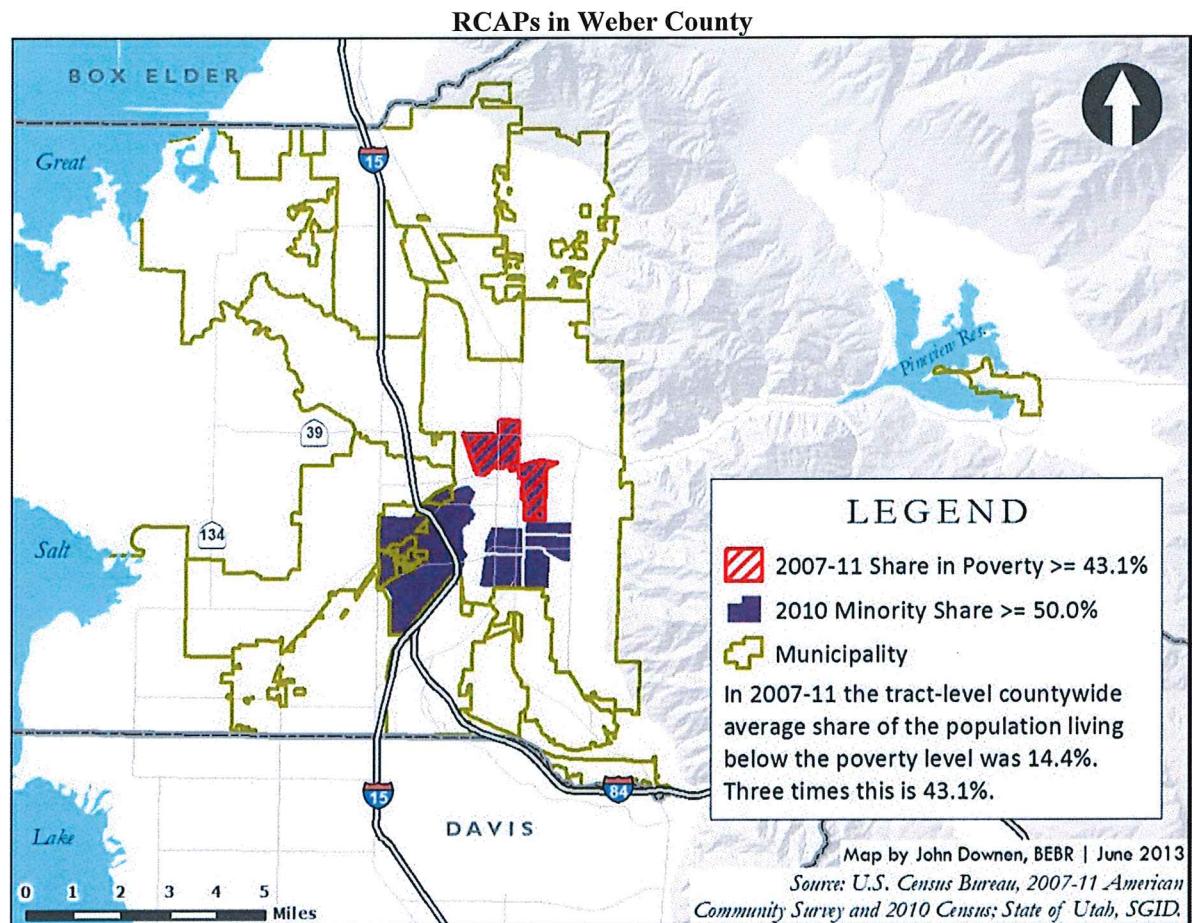


Figure 1 maps the geographical location of poor residents living in Weber County by race and ethnicity in 2010. There are much larger concentrations of poor individuals living in the central cities, particularly the south part of Ogden. In fact, the majority of both non-Hispanic whites and minority residents living below the poverty line are located in Ogden. There are also some lighter concentrations in north Ogden, near Harrisville. While the poor non-white Hispanic population of

Figure 2



In order to determine an ethnically concentrated area of poverty (ECAP) the poor Hispanic tracts were mapped *Figure 3*. This figure overlays the concentrations of poverty with tracts that have a Hispanic population of 10 percentage points or more above the 16.1 percent Hispanic share of county's population. All tracts with large Hispanic shares are located within Ogden with the exception of a small area in South Ogden. Large Hispanic populations are present in three tracts where the share of the population in poverty is greater than three-times the county average, or 43.1 percent. These tracts meet the definition of an ECAP. There are several tracts where the Hispanic share is 10 percent above the county average but these tracts do not satisfy the poverty condition.

Figure 3
Concentrations of Poverty and Hispanics by Tract in Weber County, 2007–2011

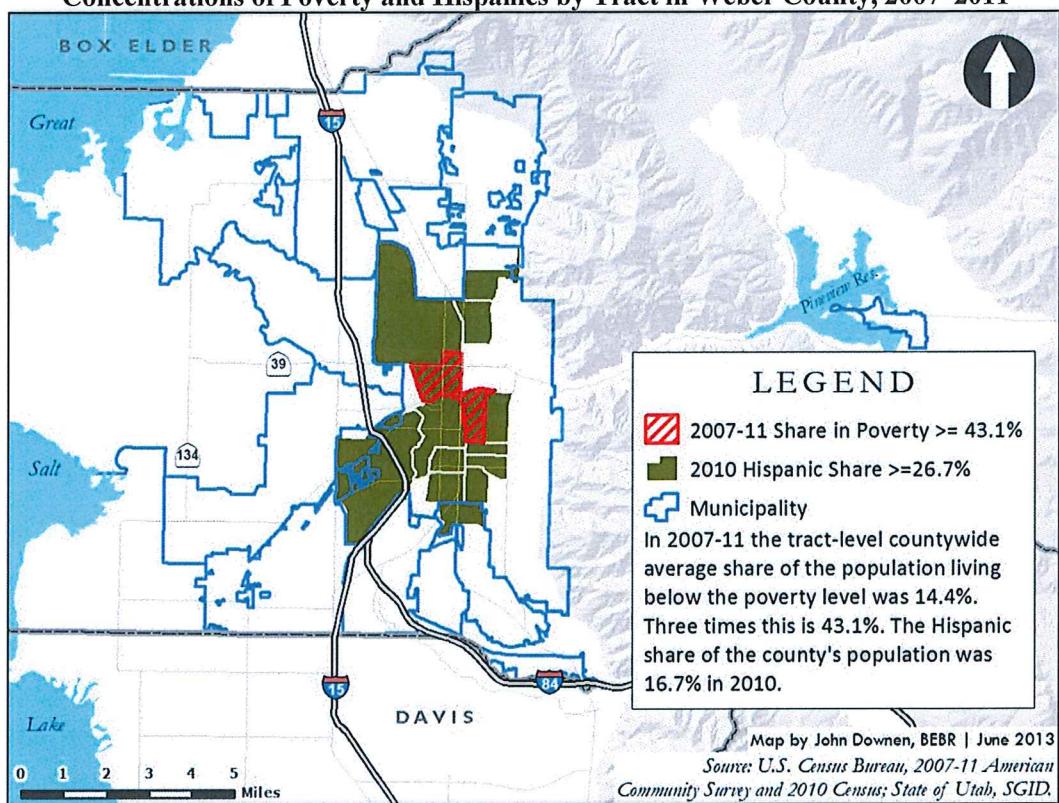


Table 4
RCAP and ECAP Census Tracts
Percent of Renter-Occupied Units

| Census Tract | Occupied Units | Renter-Occupied | % Renter-Occupied |
|--|----------------|-----------------|-------------------|
| 500 West to Washington Blvd, 900 South to 20 th Street | | | |
| 2004 | 607 | 304 | 50.1% |
| Washington Blvd to Harrison Blvd, Park Blvd to 26 th Street | | | |
| 2008 | 1,682 | 867 | 51.5% |
| 2009 | 1,712 | 1,422 | 83.1% |
| Pacific Ave to Adams Ave, 27 th Street to 36 th Street | | | |
| 2012 | 743 | 520 | 70.0% |
| 2018 | 697 | 355 | 50.9% |
| Adams Ave to Harrison Blvd, 26 th Street to 32 nd Street | | | |
| 2013.01 | 1,038 | 653 | 62.9% |
| 2013.02 | 1,148 | 559 | 48.7% |
| 1900 West to 1250 West, 24 th Street to 4400 South | | | |
| 2019 | 408 | 193 | 47.3% |

Source: U.S. Census Bureau.

Rent Assisted Maps and Tables

Figure 4

Rent Assisted Apartment Projects in Weber County, 2013

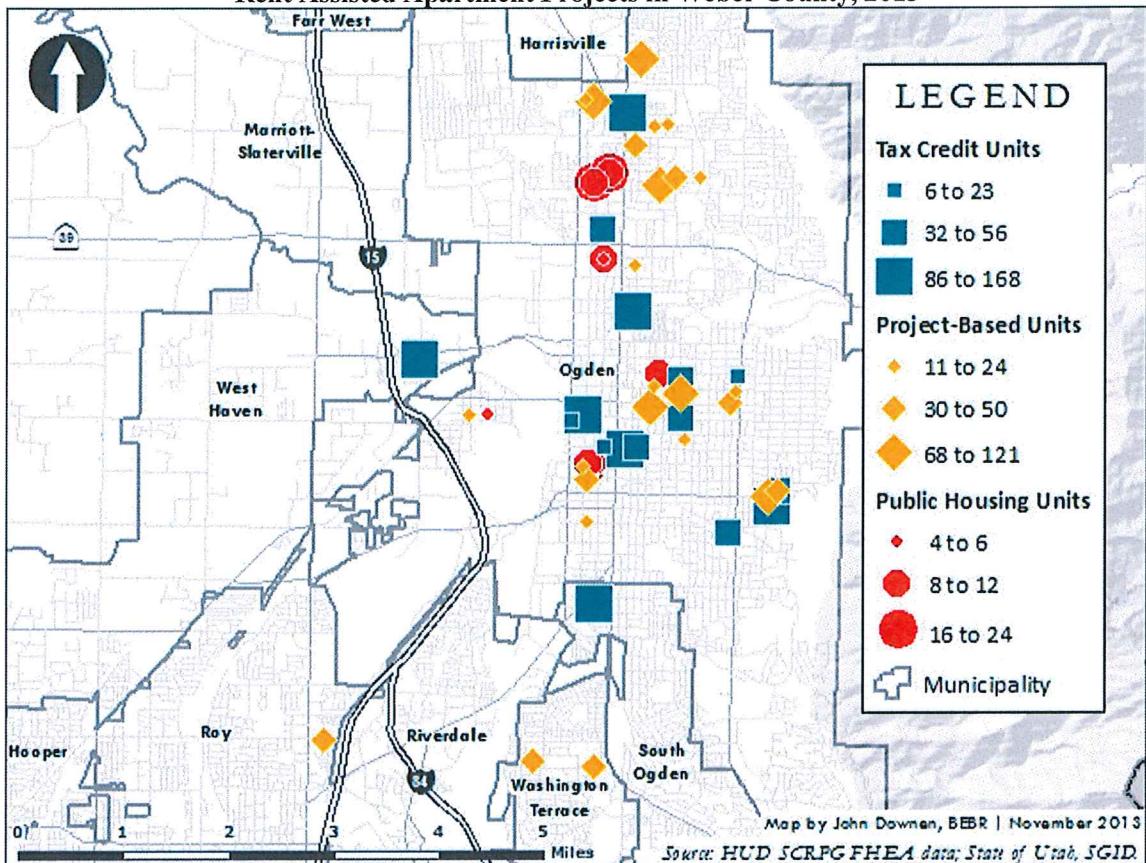


Figure 5 overlays the Section 8 voucher locations with the minority share of the population by census tract. Census tracts with higher percentages of minority residents also tend to have higher numbers of section 8 vouchers. This could indicate a high use of Section 8 vouchers within the minority communities, or simply a correlation between low-income and minority households living in neighborhoods with relatively low rents and landlords that accept 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. A large majority of the vouchers holders are in tracts in the older neighborhoods of Ogden, just to the east of the downtown commercial area and the location of a large number of low-wage jobs. However, the prevalence of Section 8 vouchers in more residential neighborhoods reflects the availability of affordable rental housing and likely suggest a need for public transportation from these residential areas to the commercial areas. As shown in Figure 6 the bus routes are limited thus the connection of affordable housing, with access to transportation and employment is weak and likely presents an impediment to fair housing choice for low-income protected classes.

Figure 5 - Section 8 Vouchers and Minority Population Share in Weber County

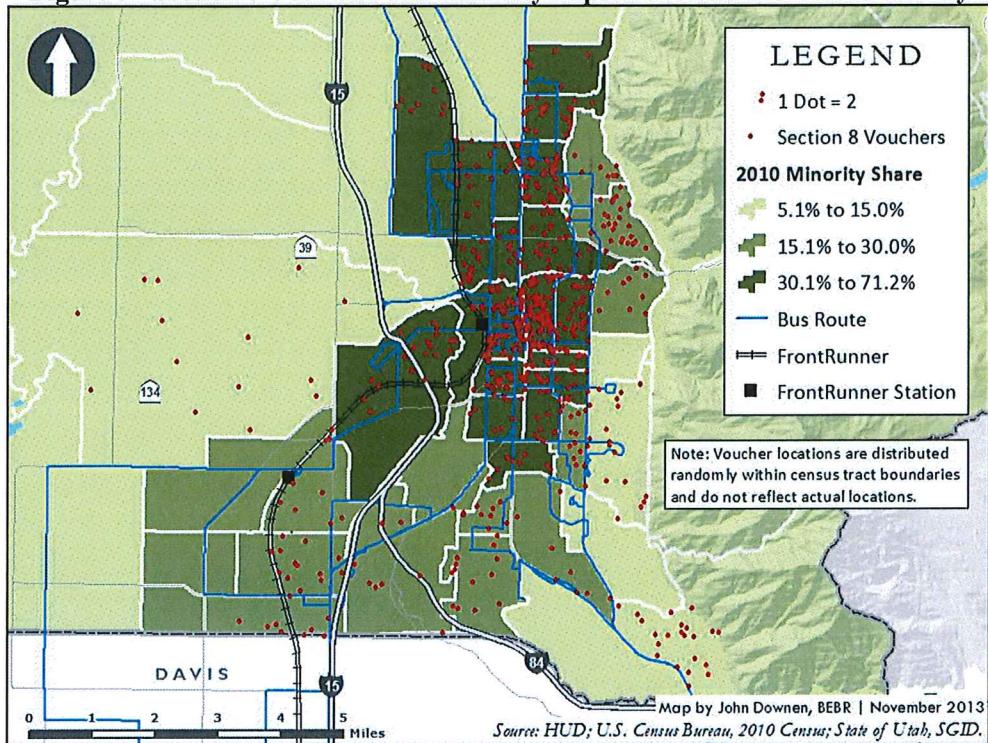
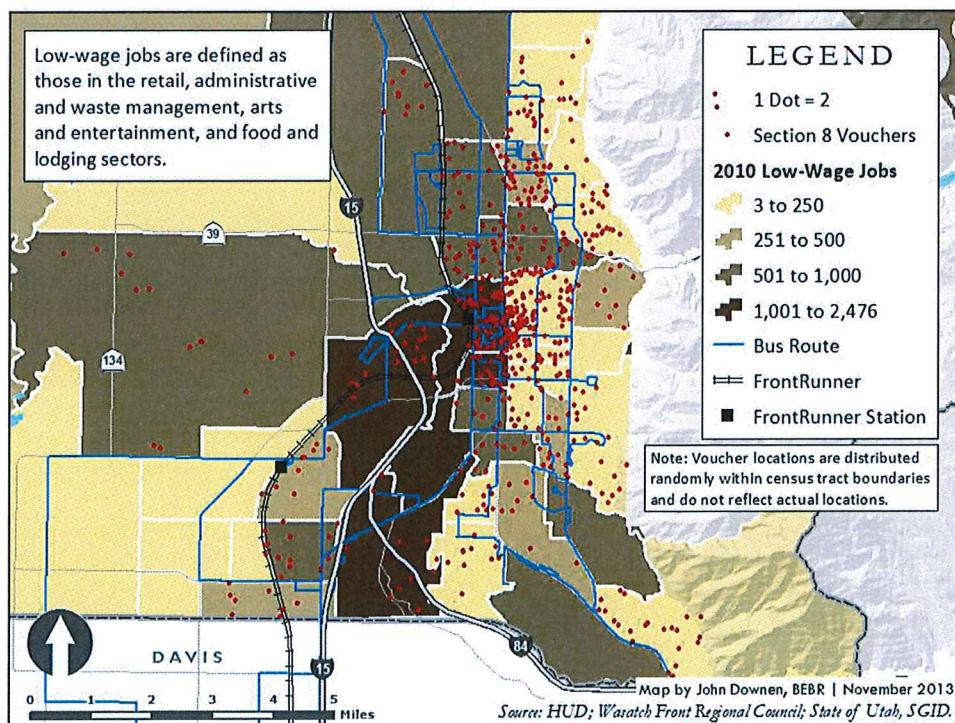


Figure 6 - Section 8 Voucher Holders and Low-Wage Jobs in Weber County



Fair Housing Complaints Tables

Table 23
Utah Legal Center Cased Calls: Characteristics of Callers with
Housing Complaints in Weber County

| | FY2013 | % Share 2013 |
|------------------------|--------|--------------|
| Total Cased | 228 | 100.0% |
| Disabled | 108 | 47.7% |
| Race | | |
| Asian/Pacific Islander | 1 | 0.4% |
| Black | 13 | 5.7% |
| Hispanic | 29 | 12.7% |
| Native American | 3 | 1.3% |
| White | 171 | 75.0% |
| Other/Unknown | 11 | 4.8% |
| Age | | |
| 0-12 | 0 | 0.0% |
| 13-17 | 0 | 0.0% |
| 18-24 | 25 | 11.0% |
| 25-59 | 158 | 69.3% |
| 60+ | 45 | 19.7% |
| Unknown | 0 | 0.0% |
| Sex | | |
| Female | 161 | 70.6% |
| Male | 67 | 29.4% |
| Unknown | 0 | 0.0% |
| Marital Status | | |
| Single | 106 | 46.5% |
| Married | 35 | 15.4% |
| Separated | 14 | 6.1% |
| Widowed | 8 | 3.5% |
| Unknown | 65 | 28.5% |

Source: Utah Legal Center

Table 24
Utah Legal Center Total Calls: Characteristics of Callers with
Housing Complaints in Weber County

| | FY2013 | % Share 2013 |
|--|--------|--------------|
| Total Calls | 449 | 100.0% |
| Age 60+ | 61 | 13.6% |
| Race | | |
| Asian/Pacific Islander | 4 | 0.9% |
| Black | 17 | 3.8% |
| Hispanic | 68 | 15.1% |
| Native American | 6 | 1.3% |
| White | 339 | 75.5% |
| Other/Unknown | 15 | 3.3% |
| Over 125% Poverty OR Over in Assets | 75 | 16.7% |
| Veteran=Yes | 33 | 7.3% |

Source: Utah Legal Center

Table 25
Housing Complaint Assistance by Disability Law Center, FY 2013
(Weber County)

| Type | Calls |
|------------------------------------|-----------|
| Level of Service: | |
| Information and Referral | 25 |
| Short Term Assistance | 23 |
| Representation at Meeting (s) | 2 |
| Total | 50 |
| Ethnicity: | |
| Hispanic/Latino | 6 |
| White (Hispanic/Latino) | 1 |
| White (Not Hispanic/Latino Origin) | 42 |
| Unknown | 1 |
| Gender: | |
| Female | 33 |
| Male | 16 |
| Unknown | 1 |
| Age: | |
| 11-20 | 3 |
| 21-30 | 10 |
| 31-40 | 9 |
| 41-50 | 9 |
| 51-60 | 15 |
| 61-70 | 5 |

Source: Disability Law Center

Note: Definition of Terms by DLC

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

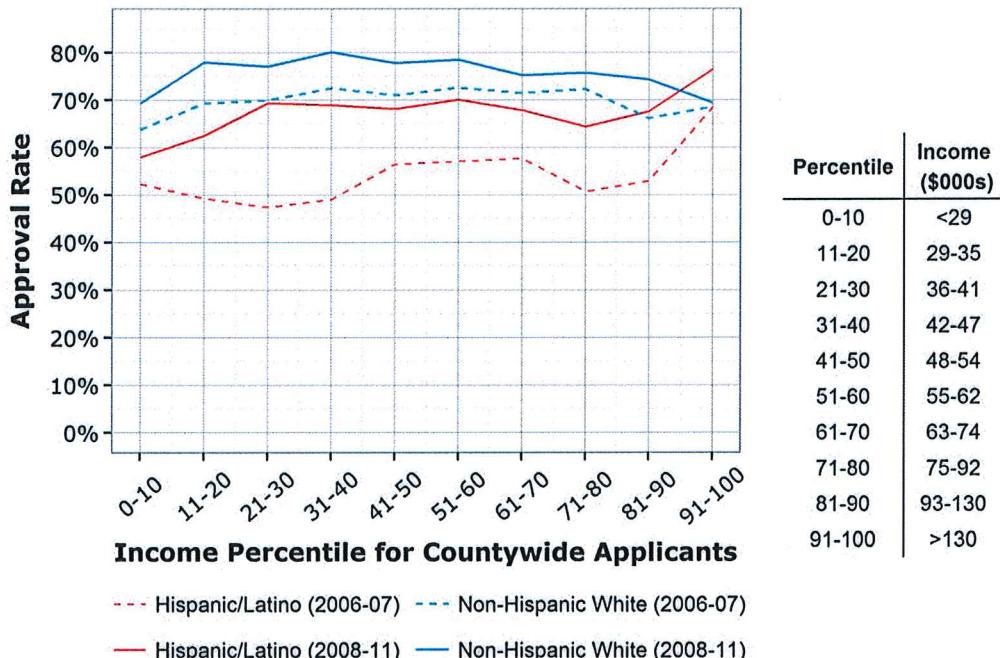
Short Term Assistance: a client was given at least one additional piece of information beyond a referral

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

Mortgage Lending Analysis

Taken from Weber county Analysys Pages 38 – 47

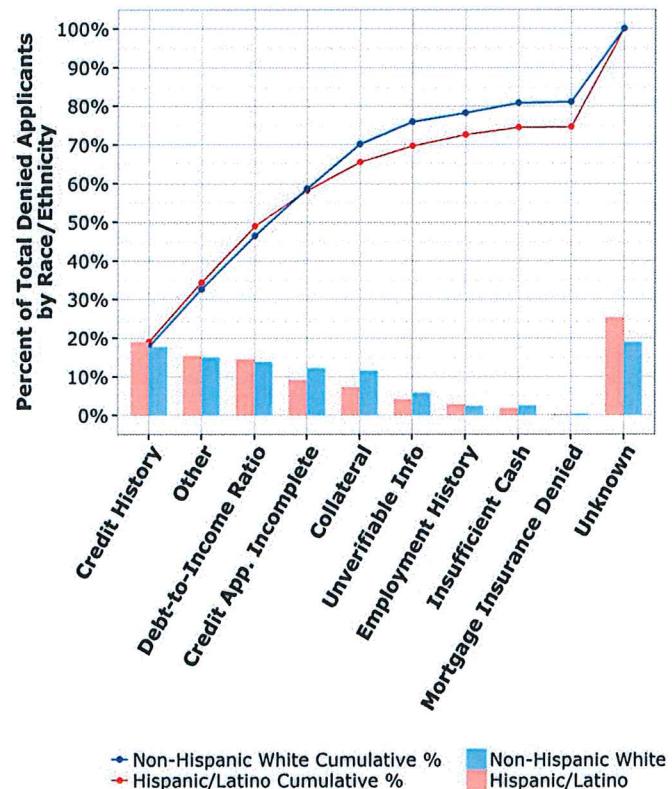


Given the small application volume for several cities in Weber County, the reported income was only disaggregated to two income brackets, using 80 percent HAMFI as the threshold. *Figure 4*, on the other hand, shows the overall county-level approval rates for both groups disaggregated by more income 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 Weber County applicants in the HMDA data from 2006 to 2011, which are shown in *Figure 4*

Despite the persistent disparity in mortgage outcomes between the two groups, other factors such as credit history could be the driving force behind the mortgage denials. *Figure 5* 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 5* shows only the primary reason for the sake of simplicity. The bar graph component of *Figure 5* shows the proportion of denied applications by race/ethnicity attributed to each denial reason. Note that 19 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 Supervision¹.

The line graph component of Figure 5 represents the cumulative percentages for the denial reasons listed from left to right. Roughly 30 percent and 28 percent of the denials among non-Hispanic white and Hispanic/Latino applicants, respectively, are due to poor credit history or 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.



The slightly disproportionately large share of Hispanic denials among those at the lowest income deciles shown *Figure 6* (Page _____ and more charts and tables) does not contradict the pervasive approval rate gaps across income deciles as shown in *Figure 4*. The former depicts the income brackets where Hispanic applicants bear the greatest burden of mortgage denials within the *entire* Hispanic applicant pool, while the latter considers the percentage of mortgage approvals within *each* income decile. Thus, income could be one minor driving force in the disproportionality of mortgage denials among the lowest-income Hispanic applicants but does not explain the pervasive approval rate gaps across nearly all income deciles.

The four quadrants of *Figure 6* are divided horizontally by race/ethnicity and vertically by the approved and denied subset (dotted lines), which are overlaid by the cumulative application distribution (solid lines). For both non-Hispanic white and Hispanic/Latino applications, the distributions have skewed more to the lower income levels after the housing boom as evidenced by the increasing concavity from the solid red lines (2006 to 2007 applications) to solid blue lines (2008 to 2011 applications). Note the cumulative distributions of approvals and total applications for non-Hispanic whites and Hispanics are nearly identical for both housing periods. This means that non-Hispanic white and Hispanic applicants at the lowest income levels have not received a disproportionately lower share of the total approved applications within their own demographic group.

On the other hand, the cumulative denial distributions do not align completely with those of the total applications for both groups. In the bottom-left quadrant of *Figure 6*, the cumulative denied distribution for Hispanics during the housing bust (dotted blue line) deviates from its cumulative total distribution (dotted blue line) across the lowest income deciles. In fact, nearly 56 of the Hispanic denials in Weber County during the housing bust reported incomes below the 20th countywide income percentile (\$35,000/year), while only 45 percent of Hispanic applicants were in the two lowest income deciles. This reflects a growing disproportionality of denials among low-income Hispanic applicants, since the deviation of the cumulative distribution of denials during the housing boom (dotted red line in the bottom-left quadrant of *Figure 6*) is only slightly more concave than the corresponding cumulative distribution of total Hispanic applicants (solid red line).

For non-Hispanic whites, the cumulative denied distribution during the housing bust (dotted blue line in the bottom-right quadrant of *Figure 6*) is concave below the countywide median and slightly convex above the median. This means that non-Hispanic white applicants during this period with reported incomes at the lowest and highest income deciles received a disproportionately higher number of denials than expected. Interestingly, this same pattern is apparent for non-Hispanic white applicants during the housing boom (dotted red line in the bottom-right quadrant of *Figure 6*). However, this disproportionality within the non-Hispanic white applicant pool is more attenuated than within the Hispanic applicant pool.

The slightly disproportionately large share of Hispanic denials among those at the lowest income deciles shown *Figure 6* does not contradict the pervasive approval rate gaps across income deciles as shown in *Figure 4*. The former depicts the income brackets where Hispanic applicants bear the greatest burden of mortgage denials within the *entire* Hispanic applicant pool, while the latter considers the percentage of mortgage approvals within *each* income decile. Thus, income could be one minor driving force in the disproportionality of mortgage denials among the lowest-income Hispanic applicants but does not explain the pervasive approval rate gaps across nearly all income deciles.

Figure 6
Cumulative Distribution of Applications, Approvals, and Denials
by Income and Race/Ethnicity in Weber County, 2006-2011

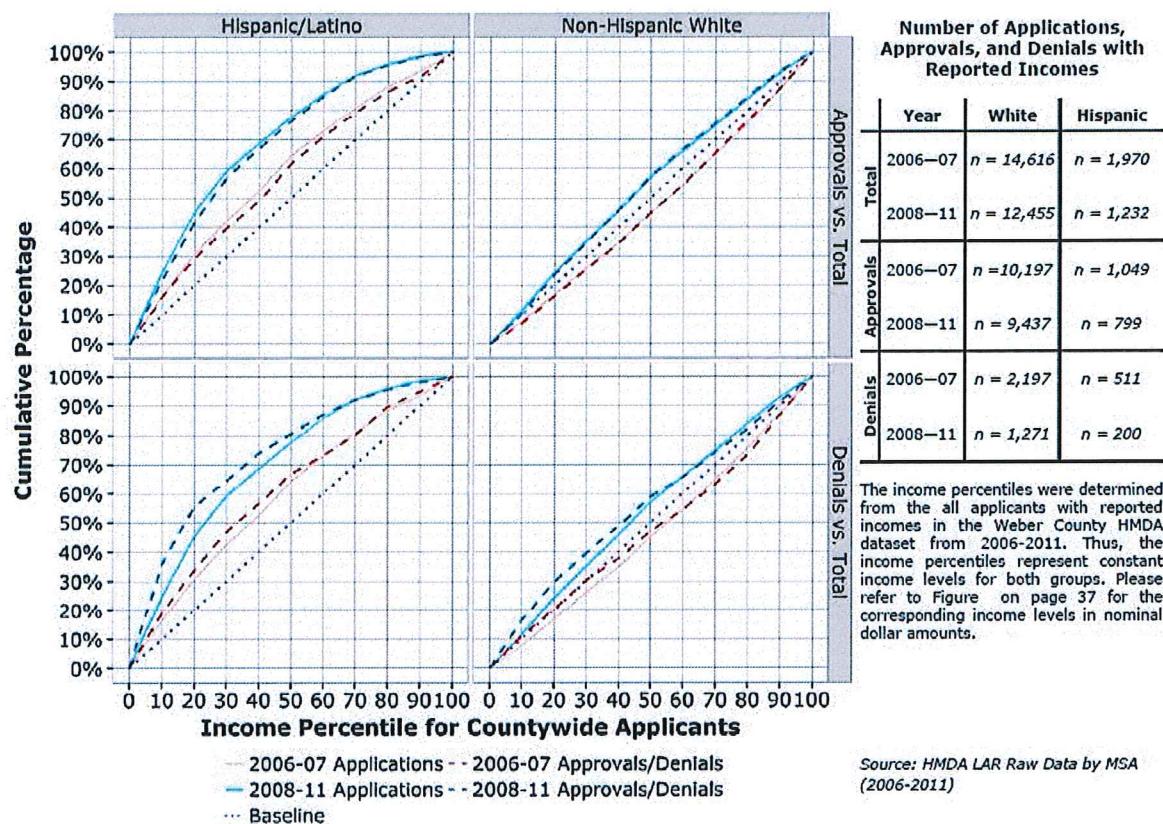


Table 1
Indices of Dissimilarity for Denials & Approvals by Race/Ethnicity in Weber County, 2006-2011

| | Denials | | Approvals | |
|--------------------|---------|------|-----------|------|
| | Boom | Bust | Boom | Bust |
| Non-Hispanic White | 0.06 | 0.07 | 0.02 | 0.02 |
| Hispanic/Latino | 0.06 | 0.12 | 0.04 | 0.03 |

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

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

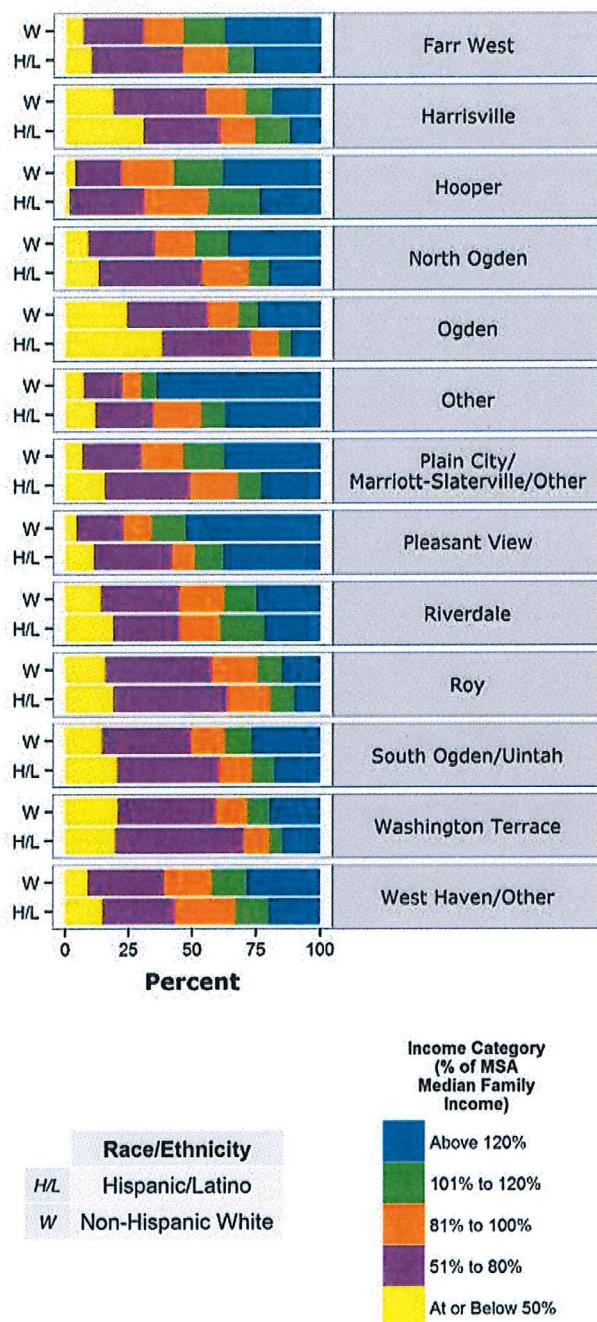
The index of dissimilarity *Table 1* measures the extent to which the income distributions of approved and denied applicants differed from the income distribution of total applicants. The indices are interpreted as the proportion of applicants that must move to another income decile in order to

For both groups, the indices of dissimilarity for approvals have remains at levels between 0.02 and 0.04 during the housing bust period. This means that 2 to 4 percent of non-Hispanic white and Hispanic applicants would have to move to other income brackets in order for the approval distributions of each group to resemble that of their respective applicant pools. *Thus, neither the indices nor the graphical representations of application outcomes by income distributions suggest that the low approval rates among Hispanic applicants are due to the income disparities across racial and ethnic groups alone, since approvals are generally issued proportionately across both groups.* The increasing indices of dissimilarity for denials among both groups reflect the growing disproportionality of denials within the lowest income deciles for both groups.

Figure 7 shows the applicant income distribution by race and ethnicity for each city in Weber County. The income categories are based on the reported incomes as a percentage of the MSA median family income (MFI). Each reported income has been adjusted as a percentage of the median family income for the year that the mortgage application was submitted.

While the income distributions within cities are skewed more toward higher income brackets for non-Hispanic white applicants than for their Hispanic counterparts, the disparities across cities are often even larger. For instance, 52 percent and 38 percent of non-Hispanic white and Hispanic applicants, respectively, who selected Pleasant View homes reported incomes greater than 120 percent MFI. On the other hand, in cities such

Figure 7
Applicant Income Distribution by Race/Ethnicity
in Weber County Cities, 2006–2011



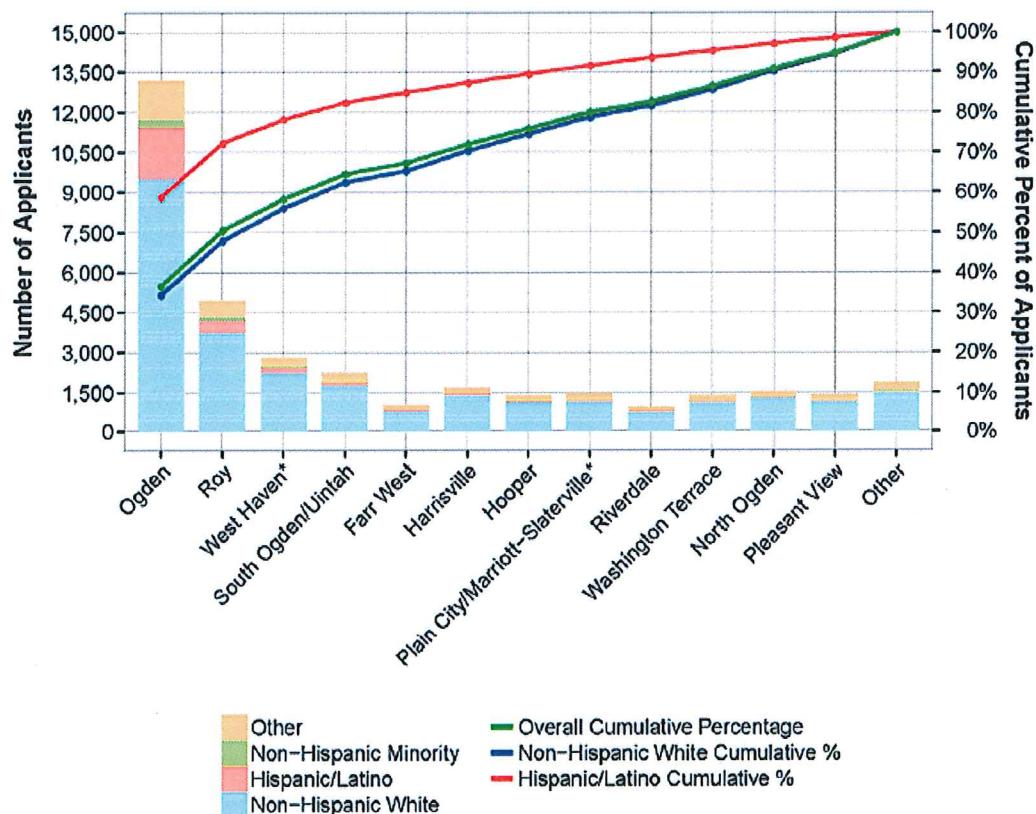
Source: HMDA LAR Raw Data (2006–2011)

as Roy and Washington Terrace, which have the median assessed values of single-family homes below \$150,000, have less than a fifth of applicants reporting incomes above 120 percent MFI for both groups. In fact, over three-quarters of the applicants selecting properties in Roy reported incomes below the median family income. Despite the skewedness at the lowest and highest income brackets, half of the applicants in both groups selecting Ogden reported incomes between 50 percent and 120 percent MFI.

Thus, lower-income applicants, regardless of race, have a tendency to apply for properties in the central and southern regions of the county, whereas more affluent applicants tend to select Pleasant View, which has one of the highest median assessed values of single-family homes in the county. While Figure 7 shows that the differences in income distributions are often larger across cities than between the two groups within each city, it does not show the self-selection effect via application volume.

Figure 8 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

Figure 8
Application Composition by Race/Ethnicity and Cities in
Weber County, 2006–2011



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

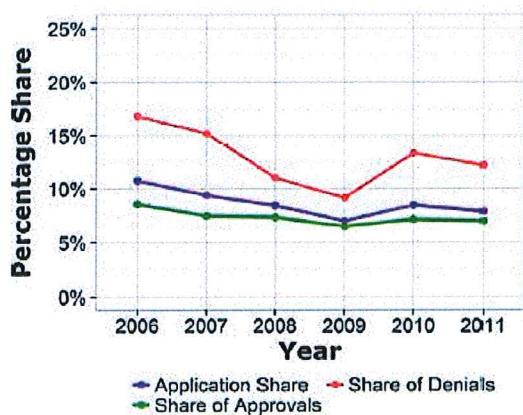
Note: The categories Plain City/Marriott-Slaterville and West Haven include unincorporated areas in the western region of Weber County, which are contained within the census tracts that encompass the three cities.

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 8* 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 Ogden to the city that corresponds to a given point on the line graphs. The green line in *Figure 8* shows that 58 percent of all Weber County applications were for homes in Ogden, Roy, and West Haven. For Hispanic/Latino applicants, this cumulative percentage is over 78 percent. Given the concentration of Hispanic/Latino applications in these three cities, the red cumulative percentage line in *Figure 8* is much more elevated than the total and non-Hispanic white cumulative percentage lines. In fact, more than seven out of every ten Hispanic applicants who applied for Weber County properties selected Ogden or Roy compared to only 48 percent of their non-Hispanic white counterparts. Thus, *Figure 8* confirms that the

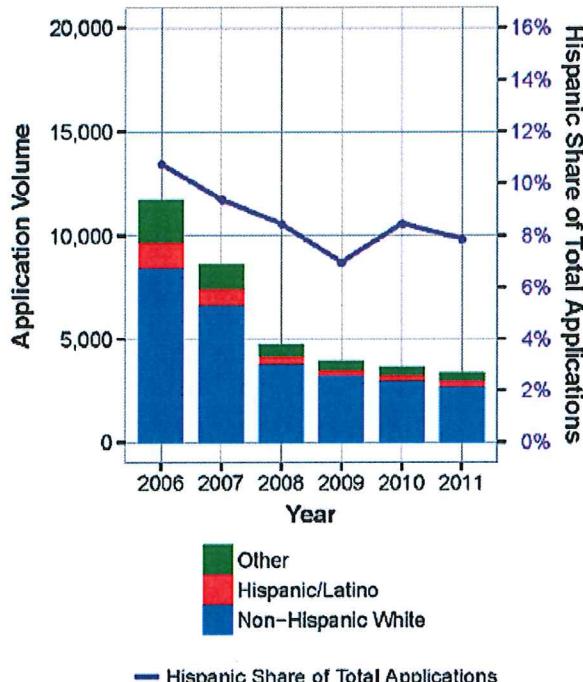
Hispanic self-selection effect in Weber County is overwhelmingly concentrated in Ogden and Roy, which have the largest Hispanic share of the total population in the county at 30 percent and 13.5 percent, respectively.

Figure 10
Hispanic Share of Mortgage Applications, Approvals, and Denials in Weber County, 2006–2011



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

Figure 9
Application Volume by Race/Ethnicity in Weber 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 the Hispanic population in Ogden and Roy, the HMDA data also reveals an even larger symptom of homeownership impediments. *Figure 9* shows the drastic declining mortgage application volume from 2006 to 2011. The application volume in fact declined by nearly 72 percent from 2006 to 2011. The purple line in *Figure 9* 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 from roughly 11 percent during the housing boom in 2006 to 7 percent in 2009 before rebounding to levels around 8 percent in the subsequent

years. 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 9*, representing the Hispanic share of total application volume, is juxtaposed in *Figure 10* with the Hispanic share of total approved and denied applications in Weber County from 2006 to 2011. With the purple line (Hispanic application share) as the baseline, *Figure 10* 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 nearly closed in 2009 with only a negligible increase in the differential during the subsequent two years, meaning that the Hispanic share of total approvals are increasingly more commensurate with the Hispanic share of total applications. On the other hand, the differential between the Hispanic share of denials and applications has widened since 2009.

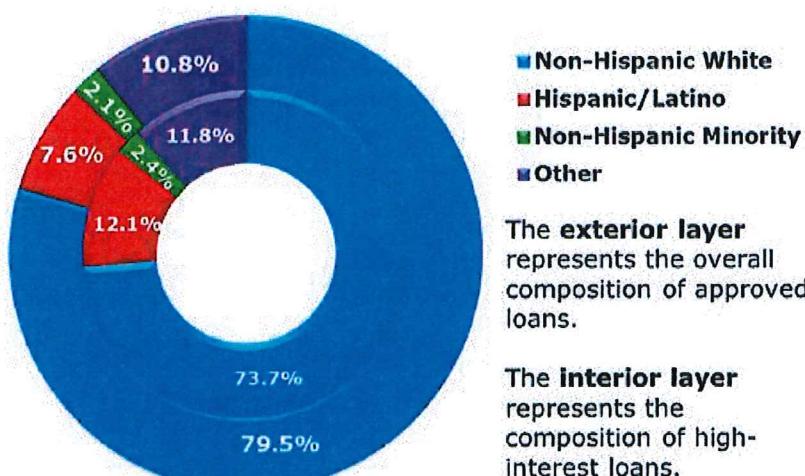
In addition to the barriers that Hispanic applicants face in the mortgage application process, the housing impediments persist following the approval process in the form of high-interest loans. Hispanic applicants receive a disproportionately high share of high-interest loans.

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 disclosure². Thus, the rate spread disclosure could potentially serve as a proxy for subprime lending. Note that for applications filed on or after October 1, 2009, the rate spread definition has been revised as the difference between the loan APR and the average prime offer rate, which is determined from the rates of representative low-risk

Figure 11
Composition of Approved Loans and High-Interest Loans in Weber County, 2006–2011



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

■ Non-Hispanic White
■ Hispanic/Latino
■ Non-Hispanic Minority
■ Other

The exterior layer
represents the overall
composition of approved
loans.

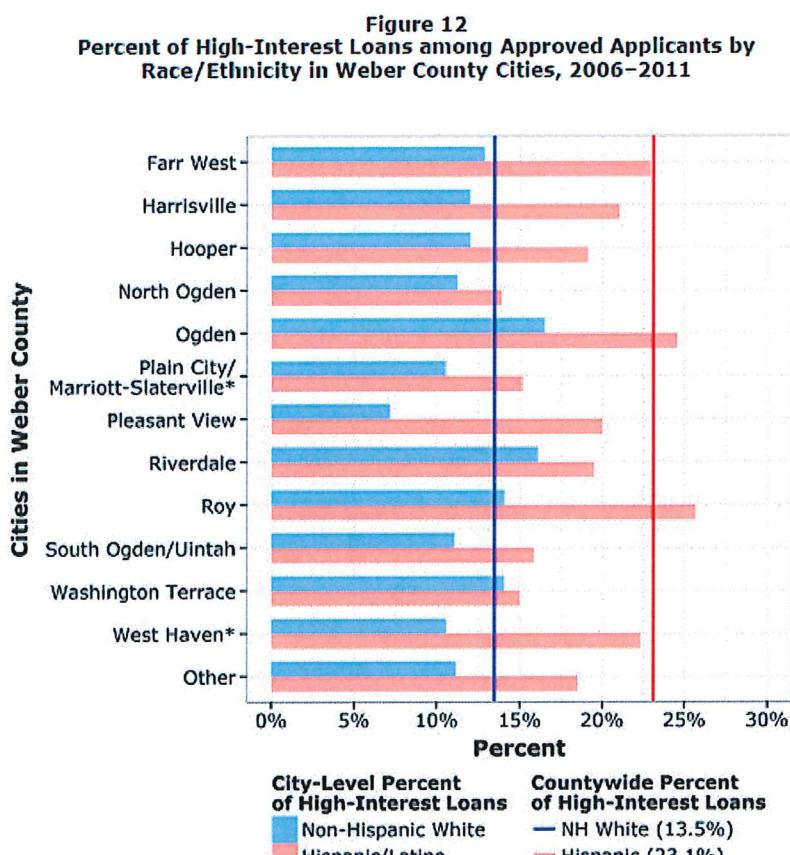
The interior layer
represents the
composition of high-
interest loans.

² 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).

mortgages currently available in the market. The reported threshold for this new rate spread is 1.5 percentage points for first liens and 3.5 percentage points for subordinate liens.³

Figure 11 shows the composition of approved loans and high-interest loans by race/ethnicity. While Hispanic/Latino applicants represented only 7.6 percent of all approved loans from 2006 to 2011, they received a disproportionate 12.1 percent of all high-interest loans. Note that 87 percent of all high-interest loans in Davis 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 Weber County. Figure 12 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 23 percent of Hispanic approved loans are considered high interest—over 1.7 times the rate among non-Hispanic white applicants. The gap is more severe in Ogden and Roy, the two cities with the highest number of Hispanic applicants. Nearly a quarter of Hispanics with approved loans for properties in Ogden received high-interest loans, compared to only 16.5 percent of their non-Hispanic white counterparts. Similarly, in Roy, nearly 26 percent of approved loans issued to Hispanics are considered high interest, compared to only 14 percent of their non-Hispanic white counterparts. Washington Terrace is the only city in Weber County with relative parity in the



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

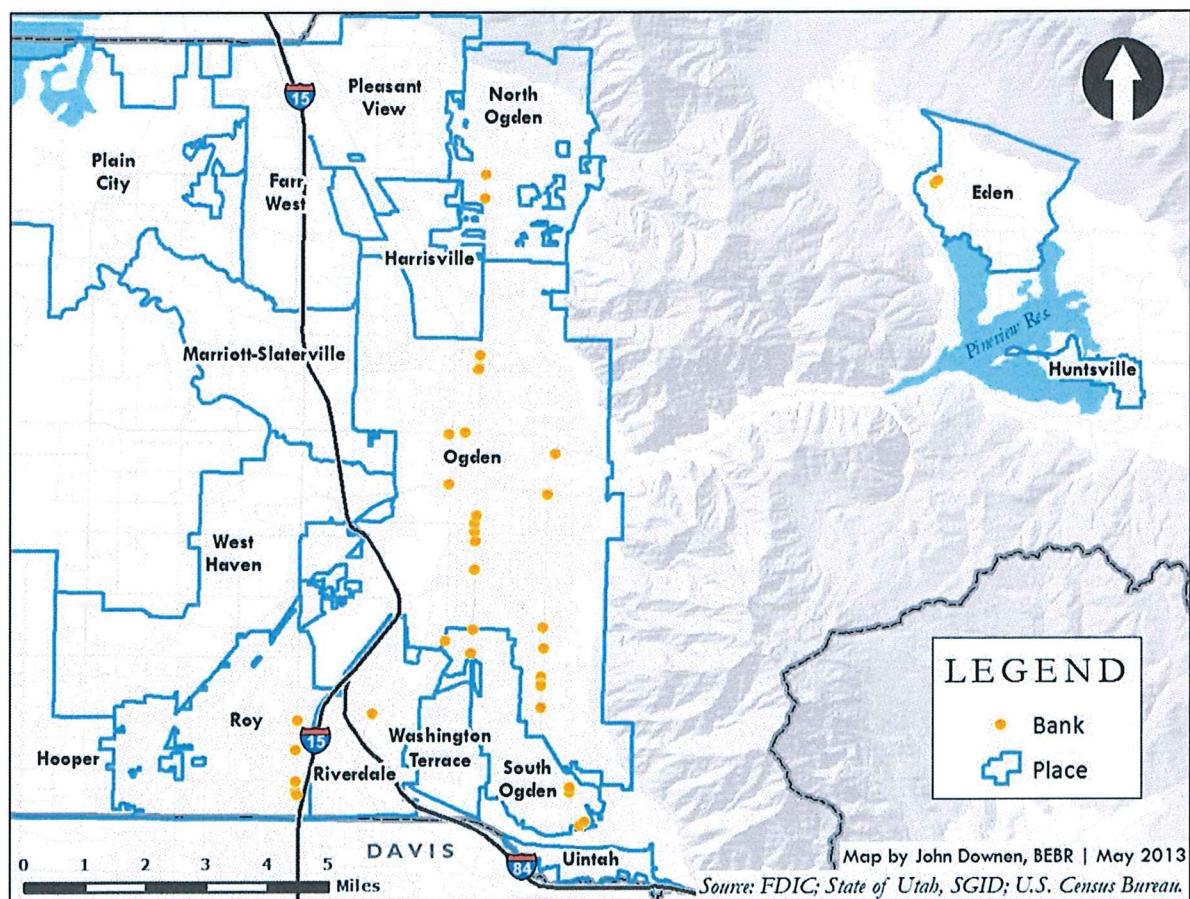
Note: The categories Plain City/Marriott-Slaterville and West Haven include unincorporated areas in the western region of Weber County, which are contained within the census tracts that encompass the three cities.

prevalence of high-interest loans, but accounts for less than 2 percent of the Hispanic applicant pool selecting Weber County properties.

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 13*. Nevertheless, the proximity to banks is another factor in the opportunity assessment of a community not only for mortgage banking but personal banking as well. The distribution of banks and branch offices are mostly concentrated in North Ogden, Ogden, Roy, and South Ogden, which account for nearly two-thirds of the Weber County population.

Figure 13
Location of Commercial Banks and Branch Offices in Weber County



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 formula⁴ 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:

$$\Delta = \frac{1}{2} \sum_{i=1}^{10} \left| \frac{a_i}{A} - \frac{r_i}{R} \right|$$

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.

⁴ 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.